



PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

April 17, 2020

Paul Klotman, M.D.  
President, CEO, and Executive Dean  
Baylor College of Medicine  
One Baylor Plaza, Ste 279A  
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Via e-mail: [president@bcm.edu](mailto:president@bcm.edu)

Dear Dr. Klotman,

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters worldwide regarding an urgent matter. Based on the repeated and documented failure of Baylor College of Medicine (BCM) to meet the provisions of the U.S. Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals, and given the COVID-19 pandemic that is influencing the shut-down of animal experiments around the world,<sup>1</sup> we urge BCM to immediately: 1) prohibit approval of new animal protocols and experiments; 2) prohibit breeding and acquisition of new animals for laboratories; 3) finalize and end ongoing animal experiments; and, 4) prove that all of these animals and experiments are concretely advancing human health, and if they're not then switch to superior human-relevant, animal-free research methods.<sup>2</sup>

### **BCM's Culture of Noncompliance: Violations to the PHS Policy on Humane Care and Use of Laboratory Animals**

According to public records obtained by PETA from the National Institutes of Health (NIH) via the Freedom of Information Act, BCM has reported many violations to the PHS Policy on Humane Care and Use of Laboratory Animals. The following are a few of them: mice who had been subjected to invasive experimental surgeries were not given analgesia in accordance with the protocol, or were given expired analgesia; mice were subjected to craniotomies, but were not given two analgesics that were specified in the protocol following the surgery; experimenters failed to use aseptic techniques while performing surgery on mice and piglets; two rabbits died due to anesthetic complications caused by improper setup of the anesthetic machine; three mice used in

<sup>1</sup> <https://www.statnews.com/2020/03/14/coronavirus-pandemic-forces-research-labs-shut-down/>

<sup>2</sup> [https://www.peta.org/wp-content/uploads/2019/11/The-Research-Modernization-Deal-Report-US\\_FINAL\\_2020\\_300.pdf](https://www.peta.org/wp-content/uploads/2019/11/The-Research-Modernization-Deal-Report-US_FINAL_2020_300.pdf)

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a tumor study exceeded humane endpoints; an anesthetized mouse who was undergoing experimental surgery started to regain consciousness because the nose cone delivering inhalant anesthesia had not been fitted properly; and baby and adult mice were subjected to toe amputations that were either unapproved or carried out without anesthesia.

### **COVID-19: Ending Animal Experiments Protects Animals, Staff, and Patients**

We understand that in response to BCM's COVID-19 contingency plan, at least one BCM experimenter "closed the lab and euthanized animals."<sup>3</sup> When combined with similar action by other experimenters, this will lead to the destruction of hundreds of animals or more who are deemed non-critical or non-essential. This begs the question why taxpayer dollars are being used on experiments that can easily be ended or delayed or that involve animals who, apparently, are considered by many universities to be extraneous to the testing in the first place. Equally troubling is that the experiments themselves are not critical to advancing human health, since more than 90 percent of highly promising basic science discoveries (most of which involve animal experiments) do not enter routine clinical use in humans.<sup>4</sup>

We call on BCM to publicly release the following information:

- 1) An itemization of all experimental protocols that will continue as part of BCM's COVID-19 response plan (such that they may be categorized as critical, essential, necessary, and/or other similar terminology);
- 2) An itemization of all experimental protocols that will not continue as part of BCM's COVID-19 response plan (such that they may be categorized as extraneous, non-critical, non-essential, ramped down, disposable, unnecessary and/or other similar terminology);
- 3) The number and species of animals who are in experimental protocols covered by item number 1 above (e.g., in a critical and/or similar terminology category), and the number and species of animals who are in experimental protocols covered by item number 2 above (e.g., not in a critical and/or similar terminology category); and,
- 4) The endpoint/disposition of animals used in experimental protocols covered by item number 2 above (e.g., not in a critical and/or similar terminology category), and notice of if, when, and how many of these animals have been and/or will be euthanized, culled, killed, destroyed, disposed or reduced in cage census.

You can contact me by e-mail at [ShalinG@peta.org](mailto:ShalinG@peta.org) or by telephone at 757-962-8325. We look forward to your swift reply to this quickly developing and urgent matter. Thank you.

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<sup>3</sup> <https://twitter.com/DrYongXu1/status/1244436197168025601>

<sup>4</sup> <https://www.bmj.com/content/348/bmj.g3387.long>

Sincerely yours,

A handwritten signature in black ink that reads "Shalin G. Gala". The signature is written in a cursive style with a large, sweeping initial "S" that loops under the rest of the name.

Shalin G. Gala  
Vice President, International Laboratory Methods  
Laboratory Investigations Department