



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

September 1, 2020

Greg S. Griffin
State Auditor
Department of Audits and Accounts
270 Washington Street, S.W., Room 1-156
Atlanta, Georgia 30334-8400

Via e-mail: griffin@audits.ga.gov

Dear Auditor Griffin,

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. **Based on the information below, we request that your office audit the performance of Georgia Institute of Technology (Georgia Tech) and the University of Georgia (UGA) regarding the apparent waste of state resources allocated to support animal research activities.**

In FY 2019, Georgia Tech and UGA received \$823 million^{1,2} in state appropriations, part of which may have been used to support animal experimentation activities. During the COVID-19 pandemic, Georgia Tech and UGA issued directives that likely led to the destruction of hundreds of animals they deemed extraneous, noncritical, or nonessential or described using similar terminology.

Georgia Tech urged its experimenters "to ramp down operations," and to "identify essential research experiments" which "should be a limited set of the current laboratory bench-based experimentation."³ UGA urged its experimenters to stop "[a]ll non-essential [animal] research ... as soon as possible,"⁴ and issued a "University Research Animal Resources (URAR) and Researcher Pandemic Service Reduction Plan" that includes the following instructions: "[c]ull animals not needed and begin

¹Georgia Institute of Technology. (2019, September 20). *Annual financial report for fiscal year ended June 30, 2019*. http://www.fin-services.gatech.edu/sites/default/files/documents/ead-19-503-georgia_institute_of_technology_-_audited.pdf

²University of Georgia. (2019, September 3). *Annual financial report*. <https://busfin.uga.edu/accounting/UGAafrcy.pdf>

³Georgia Institute of Technology. (2020, March 17). *Research ramp down plan*. <https://research.gatech.edu/research-ramp-down-plan>

⁴University of Georgia. (2020, March 23). *Guidance on essential animal research University Research Animal Resources and the Office of Animal Care and Use*. https://research.uga.edu/docs/units/uror/EssentialAnimalResearch_20200323.pdf

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breeding solely to maintain valuable colonies;" "[f]lag most valuable rat and mouse cages ... as VIP;" "[e]uthanize rodents requiring repeated treatment when research staff are unable to complete them;" "[t]argeted euthanasia of mice and rats, for non-'VIP', priority save, cages;" and, "[e]uthanize remaining animals as outlined in the URAR disaster plan, following sentient animal order."⁵

That activities supporting unnecessary, "non-essential," noncritical, or extraneous animal experimentation are taking place at Georgia Tech and UGA at an apparent annual cost of millions of dollars, some of which may have been funded by the state, is the height of absurdity and wastefulness, and it is well within the mandate of your office to investigate this matter and rectify it.

We respectfully urge that your office investigate and assess the following information as it relates to the apparent waste of state funds by Georgia Tech and UGA on activities supporting experiments—and/or on the animals used in them—that the schools deemed extraneous during the COVID-19 pandemic:

- 1) Any and all state-funded activities supporting animal experiments that Georgia Tech and UGA suspended and/or ended in accordance with its response to COVID-19, such that the experiments may be categorized as unnecessary, extraneous, noncritical, or nonessential or described using similar terminology
- 2) The number and species of any and all animals used in state-funded research activities at Georgia Tech and UGA covered by item number 1 above
- 3) The number and species of any and all animals used in state-funded experiments who are categorized by Georgia Tech and UGA as unnecessary, extraneous, noncritical, or nonessential or described using similar terminology
- 4) The endpoint disposition (to include—but not be limited to—euthanasia, cull, sacrifice, killing, destruction, disposal, and/or reduction in cage census) of any and all animals used in state-funded experiments at Georgia Tech and UGA covered by item number 1 above
- 5) The endpoint disposition (to include—but not be limited to—euthanasia, cull, sacrifice, killing, destruction, disposal, and/or reduction in cage census) of any and all animals at Georgia Tech and UGA used in experiments receiving state funds who are themselves covered by item number 3 above
- 6) State funds used to support experiments at Georgia Tech and UGA covered by item number 1 above, to include—but not be limited to—the purchase, breeding, housing, feeding, maintenance, and/or veterinary care of any and all animals used in these experiments, and/or the payment of salaries and/or

⁵University of Georgia. (2020, March 23). *UGA University Research Animal Resources (URAR) and researcher pandemic service reduction plan*. https://research.uga.edu/docs/units/urar/UGA_URAR_service_reduction_plan_COVID-19_20200323.pdf

wages of personnel who attended to any and all animals used in these experiments

- 7) State funds used to purchase, breed, house, feed, maintain, or administer veterinary care to any and all animals—or pay the salaries and/or wages of personnel who attended to them—at Georgia Tech and UGA covered by item number 3 above

Furthermore, the decision by Georgia Tech and UGA to keep purchasing, breeding, housing, feeding, and maintaining animals to be used in state-funded research activities—where the experiments or animals themselves are deemed unnecessary, nonessential, noncritical, or extraneous or described using similar terminology—is at odds with the U.S. Public Health Service's *Guide for the Care and Use of Animals*, which includes the principle of "consideration of alternatives (in vitro systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals,"⁶ and with the *U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training* (1985), which state, "The animals selected for a procedure should be of an appropriate species and quality and the minimum number required to obtain valid results."⁷

When Georgia Tech and UGA buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, extraneous, nonessential, or noncritical or described using similar terminology, they are squandering limited public resources and flouting the bedrock "3Rs" principles of reducing, replacing, and refining the use of animals in experimentation that are enshrined in government regulations and policies.

Moreover, the Congressional Research Service has found that during the COVID-19 pandemic, "[s]uspending research may result in additional costs for activities such as animal care," and "[r]estarting research, when conditions permit, may also incur costs for staff time and supplies to ... reestablish laboratory animal populations."⁸ Georgia taxpayers should not be responsible for incurring additional costs to re-establish research activities involving animals, since Georgia Tech and UGA deemed many of them not to be essential to the experiments and because resuming these activities and repopulating animals in laboratories at taxpayers' expense would appear to violate federal regulations and policies that mandate the minimization of animal use in experiments.

⁶National Research Council (U.S.) Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *Guide for the care and use of laboratory animals*. 8th edition. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>.

⁷National Research Council (U.S.) Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *Guide for the care and use of laboratory animals*. Appendix B: *U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training*. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>.

⁸Congressional Research Service. (2020, April 10). *Effects of COVID-19 on the federal research and development enterprise*. <https://crsreports.congress.gov/product/pdf/R/R46309>.

Based on this information, we urge your office to assess the use of public money, personnel, property, equipment, and space by Georgia Tech and UGA for activities supporting experiments on animals that they deem unnecessary, extraneous, "non-essential," or noncritical or describe using similar terminology. If wastefulness is corroborated, we request that you take all corrective actions to ensure that current state-funded research activities involving such animals are permanently terminated, that new state-funded research activities that include such animals are no longer approved, and that the breeding and acquisition of such animals for state-funded research activities are prohibited.

You can contact me at ShalinG@peta.org. We look forward to your reply regarding this important matter. Thank you.

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