



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

September 2, 2020

Lindsey Perry, CPA, CFE
Arizona Auditor General
2910 N. 44th St., Ste. 410
Phoenix, AZ 85018-7271

Via e-mail: lperry@azauditor.gov; contact@azauditor.gov

Dear Auditor Perry,

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 Arizona State University (ASU) and the University of Arizona (UArizona) regarding the apparent waste of state resources allocated to support animal research activities.**

In FY 2019, ASU and UArizona received nearly \$700 million^{1,2} in state appropriations, part of which may have been used to support animal experimentation activities. During the COVID-19 pandemic, ASU and UArizona issued directives that likely led to the destruction of hundreds of animals they deemed extraneous, noncritical, or nonessential or described using similar terminology.

ASU urged its experimenters to "not begin any additional animal experiments" and to "[e]stablish protocols ... to include ... halt of experiments."³ UArizona expected some of its experimenters to "completely ramp down" their laboratories,⁴ and according to a memorandum obtained by PETA through a Freedom of Information Act, it informed its deans, associate deans for research, directors, and department heads that its "de facto position" is that all research performed at its facilities "is considered non-essential."⁵

¹Arizona State University. (n.d.). *Current budget*. <https://cfo.asu.edu/current-budget>. ASU received \$328,800 million in state appropriations.

²University of Arizona. (2020, October). *Comprehensive annual financial report*. <https://www.fso.arizona.edu/sites/default/files/2019-10/cafr2019.pdf>. UArizona received \$370,060 million in state appropriations.

³Arizona State University. (2020, March 18). *Laboratory ramp-down guidance and checklist*. <https://www.asu.edu/ehs/documents/asu-research-lab-ramp-down-guidance.pdf>

⁴University of Arizona. (2020, March 17). *Procedure for temporary laboratory closure*. <https://research.arizona.edu/procedure-temporary-laboratory-closure>

⁵University of Arizona. (2020, March 17). *Memo essential research ERC final*. https://www.peta.org/wp-content/uploads/2020/08/20-04-01_University-of-Arizona-Memo-Essential-Research.pdf

Washington, D.C.
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Berkeley
2855 Telegraph Ave.
Ste. 301
Berkeley, CA 94705
510-763-PETA

Info@peta.org
PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

That activities supporting unnecessary, "non-essential," noncritical, or extraneous animal experimentation are taking place at ASU and UArizona 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 ASU and UArizona 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 ASU and UArizona 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 ASU and UArizona 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 ASU and UArizona 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 ASU and UArizona 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 ASU and UArizona used in experiments receiving state funds who are themselves covered by item number 3 above
- 6) State funds used to support experiments at ASU and UArizona 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 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 ASU and UArizona covered by item number 3 above

Furthermore, the decision by ASU and UArizona 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*

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>.

(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 ASU and UArizona 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 Arizona taxpayers should not be responsible for incurring additional costs to re-establish research activities involving animals, since ASU and UArizona 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.

Based on this information, we urge your office to assess the use of public money, personnel, property, equipment, and space by ASU and UArizona 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,



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

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>.