

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

September 3, 2020

Doug Ringler, CPA, CIA  
Auditor General  
201 N. Washington Square, Sixth Floor  
Lansing, Michigan 48913

Via e-mail: [dringler@audgen.michigan.gov](mailto:dringler@audgen.michigan.gov)

Dear Auditor Ringler,

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 the University of Michigan (UM) regarding the apparent waste of state resources allocated to support animal research activities.**

In FY 2019, UM received more than \$370 million<sup>1</sup> in state appropriations, part of which may have been used to support animal experimentation activities. During the COVID-19 pandemic, UM urged its experimenters to "ramp down all noncritical laboratory research activities by 5 p.m. on Friday, March 20"<sup>2</sup> by identifying "up to 20% of animals" that they "consider most critical to save"<sup>3</sup> and euthanizing "males if there are several of the same strain" and pups "prior weaning."<sup>4</sup> These directives likely led to the destruction of hundreds of animals UM deemed extraneous, noncritical, or nonessential or described using similar terminology.

That activities supporting unnecessary, nonessential, "noncritical," or extraneous animal experimentation are taking place at UM 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.

<sup>1</sup>PricewaterhouseCoopers. (2019, October 17). *Report on independent auditors.*

<https://2019.annualreport.umich.edu/uploads/fy19-complete-financial-statements.pdf>

<sup>2</sup>University of Michigan. (2020, March 18). *March 18, 2020 U-M ramps down noncritical laboratory research activities.* [https://research.umich.edu/sites/default/files/resource-download/covid-19\\_u-m\\_ramps\\_down\\_noncritical\\_laboratory\\_research\\_activities.pdf](https://research.umich.edu/sites/default/files/resource-download/covid-19_u-m_ramps_down_noncritical_laboratory_research_activities.pdf)

<sup>3</sup>University of Michigan. (2020, March 16). *Guidance on COVID-19 situation.*

*Safeguarding & supporting your animal research.* <https://mailchi.mp/umich/covid-19-animalcare-guidance-3162020-2>

<sup>4</sup>University of Michigan. (2020, March). *COVID-19: Guiding principles for working safely with research animals in the vivarium. Potential ramp down of research operations. What are the best methods for us to reduce our animal breeding colonies, if absolutely necessary?* <https://animalcare.umich.edu/announcements/covid-19-guiding-principles-working-safely-research-animals-vivarium>

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

- 1) Any and all state-funded activities supporting animal experiments that UM 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 UM 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 UM 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 UM 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 UM used in experiments receiving state funds who are themselves covered by item number 3 above
- 6) State funds used to support experiments at UM 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 UM covered by item number 3 above

Furthermore, the decision by UM 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,"<sup>5</sup> 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."<sup>6</sup>

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<sup>5</sup>National 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*. 8<sup>th</sup> edition. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>.

<sup>6</sup>National 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*.

When UM buys, breeds, traps, and/or uses 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, it is 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."<sup>7</sup> Michigan taxpayers should not be responsible for incurring additional costs to re-establish research activities involving animals, since UM 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 UM for activities supporting experiments on animals that it deems unnecessary, extraneous, nonessential, or "noncritical" or describes 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](mailto: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

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*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/>.

<sup>7</sup>Congressional Research Service. (2020, April 10). *Effects of COVID-19 on the federal research and development enterprise.*

<https://crsreports.congress.gov/product/pdf/R/R46309>.