

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

November 25, 2020

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Acting Director
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Via e-mail: Sandra.Shewry@cdph.ca.gov; Erica.Pan@cdph.ca.gov

Dear Director Shewry and Dr. Pan,

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 related to the ongoing COVID-19 pandemic, which in California has resulted in more than 1.1 million cases and more than 18,700 deaths.¹ **Given the uncertainty of the reopening of California and the continued high infection rates throughout the country, we urge you to intervene for the sake of public health and permanently end experiments on animals at laboratories and universities in your state, starting with those already deemed by institutions themselves to be non-essential during the initial shutdown because of COVID-19.**

In response to the shutdown, laboratories throughout California and the U.S. deemed experiments and the animals used in them to be "extraneous" or "non-essential," among other similar terms—and therefore euthanized thousands of these animals assigned to laboratory experiments. Below are the schools in California that issued guidance indicating, or likely indicating, the culling of animals in laboratories in response to COVID-19:

¹Covid in the U.S.: Latest map and case count. *New York Times*. [accessed 2020 Nov. 25]. <https://www.nytimes.com/interactive/2020/us/coronavirus-us-cases.html>.

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- Chapman University: The university instructed experimenters that “no animal research activity should commence during the campus closure.”²
- Stanford University: The university indicated plans to “[r]educe rodent breeding to only numbers required to maintain lines.”³
- University of California–Berkeley: The university indicated plans to “ramp down, curtail, or postpone, animal research experiments.”⁴
- University of California–Davis: The university directed experimenters to “ramp down any non-critical on-site research activities.”⁵
- University of California–Los Angeles: The university urged experimenters to “ramp down or terminate research.”⁶
- University of California–San Diego: The university urged its experimenters to “[c]onsider culling non-essential animals.”⁷
- University of California–San Francisco: The university informed its experimenters that “[i]n mouse facilities, breeding should be reduced to the minimum possible; no increases in cage counts will be permitted and all researchers should plan for additional reductions of cage counts in the future.”⁸
- University of Southern California: The university told experimenters to “suspend certain studies and euthanize animals.”⁹

PETA questions why any of these animals are being bought, bred, trapped, or experimented on in the first place since they’re now, in response to the pandemic, so readily being disposed of and since experiments are now being ended or delayed. Expending precious research resources and taxpayer funds on animal testing—especially experiments and the animals used in them deemed by the institutions themselves to be “non-essential”—is the height of absurdity and waste and should not continue, nor should laboratory personnel endanger their health for such experiments.

²2020 March 13. FAQs for COVID-19 research continuity. [accessed 2020 Nov. 25]. <https://blogs.chapman.edu/research/2020/03/13/office-of-research-covid-19-faqs/>.

³2020 April 10. What must research labs do to ensure the continued care of research animals? [accessed 2020 Nov. 25]. <https://healthalerts.stanford.edu/covid-19/faq/what-must-research-labs-do-to-prepare-for-the-care-of-research-animals-in-case-of-disruption/>.

⁴Katz R.H. 2020 March 16. Research continuity & transitioning research to remote operation. [accessed 2020 Nov. 25]. https://vcresearch.berkeley.edu/sites/default/files/inline-files/VCR_CalMessage3-16-20-research_continuity_transitioning_research_remote_operations_2.pdf.

⁵2020 March 17. Campus guidance on reducing on-campus research activities due to COVID-19. [accessed 2020 Nov. 25]. <https://research.ucdavis.edu/campus-guidance-on-reducing-on-campus-research-activities-due-to-covid-19-2/>.

⁶COVID-19 update and FAQs from UCLA ARC and DLAM services. [accessed 2020 Nov. 25]. https://labs.dgsom.ucla.edu/dlam/announcements/item?item_id=133782.

⁷COVID-19: Continuity of research. [accessed 2020 March 18]. <https://web.archive.org/web/20200318202601/https://blink.ucsd.edu/research/COVID-19-research.html#Animal-Research>. The original source of this information has been updated (<https://blink.ucsd.edu/research/COVID-19-research.html#Animal-Research>).

⁸2020 March 15. IMPORTANT: Directive to UCSF researchers to cease research activities. [accessed 2020 Nov. 25]. <https://research.ucsf.edu/important-directive-ucsf-researchers-cease-research-activities>.

⁹Novel coronavirus (COVID-19) research-related updates. [accessed 2020 April 1]. <https://web.archive.org/web/20200401232429/https://research.usc.edu/coronavirus/>. The original source of this information has been updated (<https://research.usc.edu/coronavirus/#vivaria>).

Research facilities and universities, including the universities noted above, are carrying out plans for a return to laboratory experiments. However, infection rates throughout the U.S. recently hit record highs.¹⁰ Once-safe activities—including working in close proximity to others in enclosed spaces like laboratories—will continue to pose a risk to human health for the foreseeable future. Particularly given that so many of these animal experiments have already been determined to be non-essential, allowing animal experiments to resume in California cannot be justified.

Moreover, if California is forced to shut down again, more animals will undoubtedly be euthanized and money that could otherwise have gone to more effective and human-relevant, non-animal studies benefiting public health will be wasted. The possibility that California may need to shut down once more cannot be discounted. Dr. Anthony Fauci previously urged states with surging infection rates to “seriously look at shutting down” again.¹¹ Thirty-one states, including California, have tightened restrictions in November in light of the worsening pandemic; other states have extended previously implemented restrictions.¹²

As the state’s top health officials, you have the authority to “take measures as are necessary to ... prevent [the] spread” of infectious diseases like COVID-19.¹³ Would you please intervene to end experiments on animals, starting with those previously deemed by institutions to be non-essential or described using similar terminology, which pose an unjustifiable risk to those working in laboratories and the public more broadly?

You can contact me at ShalinG@peta.org or 757-962-8325. We look forward to your reply to this rapidly developing and urgent matter. Thank you.

Sincerely yours,



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¹⁰Covid-19: U.S. records 1 million new cases in a week. *New York Times*. [accessed 2020 Nov. 16]. <https://www.nytimes.com/live/2020/11/15/world/covid-19-coronavirus>.

¹¹Feuer W. 2020 July 9. States with severe coronavirus outbreaks should ‘seriously look at shutting down,’ Dr. Fauci says. *CNBC*. [accessed 2020 Nov. 17]. <https://www.cnbc.com/2020/07/09/states-with-severe-coronavirus-outbreaks-should-seriously-look-at-shutting-down-dr-fauci-says.html>.

¹²COVID-19 restrictions: Map of COVID-19 case trends, restrictions and mobility. *USA Today*. [accessed 2020 Nov. 22]. <https://www.usatoday.com/storytelling/coronavirus-reopening-america-map/#restrictions>.

¹³California Health and Safety Code 120140. https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=105.&title=&part=1.&chapter=2.&article.