



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

February 17, 2021

Nicole Galloway, C.P.A.
Missouri Office of the State Auditor

Via e-mail: moaudit@auditor.mo.gov;
nicole.galloway@auditor.mo.gov

Dear Auditor Galloway,

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 to share new information we have obtained that is pertinent to our previous letter of September 9, 2020, in which we requested that your office audit the performance of the University of Missouri System (UM) regarding the apparent waste of state resources allocated to animal research activities.

Based on the new information presented below, we request, as part of any audit your office pursues into this matter, that you: 1) seek reimbursement of any and all state funds used to acquire, breed, confine and/or maintain the animals used in experiments whom UM categorized as unnecessary, extraneous, noncritical, non-essential, ramped down, disposable, nonpriority and/or described using similar terminology and—according to documents obtained by PETA through Freedom of Information Act (FOIA) requests—euthanized in response to COVID-19; and, 2) 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.

Euthanizing Unnecessary Animals in UM Experiments Wastes Taxpayer Funds

In FY2020 UM received more than \$364 million¹ in state appropriations, part of which may have been used to support animal experimentation activities. According to new documents obtained by PETA through FOIA requests, animals assigned to the following protocols—which likely involve the use of Missouri state money, personnel, property, equipment, and space by UM for such activities—

¹University of Missouri. (n.d.). *2020 Financial report*.
<https://collaborate.umsystem.edu/sites/controller/public/Accounting%20Services/finrpt20.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.)

were deemed unnecessary, extraneous, noncritical, non-essential or similar terminology and killed in response to a directive issued by UM amid the COVID-19 pandemic in which the university notified staff “about ramping down research activities where possible”:²

- The protocols “Extracellular Vesicle Mediated Cell-Cell Communication in Bone” and “Muscle-Bone Imaging Core” are led by the University of Missouri Kansas City’s (UMKC) Sarah Dallas.
- The protocols “Animal Exercise and Analysis Core,” and “Estrogen Receptor Mediated Regulation of Bone-Muscle Crosstalk During Aging” are led by UMKC’s Mark Johnson.
- The protocol “Tissue Engineered Cell Transplantation for Glaucoma and Optic Neuropathies” is led by UMKC’s Karl Kador.

The euthanasia of animals related to Dallas’s, Kador’s, and Johnson’s aforementioned protocols, stemming from UM’s response to COVID-19, was logged in “euthanasia record” forms for the Laboratory Animal Research Core Hospital Hill facility, corresponding to dates in March, April, May, and June.³

The fact that laboratories led by UM’s employees had animals deemed unnecessary, extraneous, noncritical, non-essential or similar terminology in the first place should raise significant red flags, especially since their experiments are funded and/or supported by taxpayers who should not have to foot the bill for such waste.

UM Protocols Failed to Reduce and Replace Animal Use

The presence of unnecessary, non-essential, noncritical, or extraneous animals in UM laboratories flies in the face of existing regulations designed to minimize the use of animals in experiments.

Government policy language requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the National Institutes of Health Revitalization Act of 1993, the eighth edition of the *Guide for the Care and Use of Laboratory Animals*, and the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training:

- The Health Research Extension Act of 1985 states, “The Director of NIH shall require each applicant for a grant, contract, or cooperative agreement involving research on animals ... to include in its application or contract proposal ... (1) assurances satisfactory to the Director of NIH that ... (B) scientists, animal technicians, and other personnel involved with animal care, treatment, and use

²University of Missouri. (n.d.). *Ramp-down letter*. <https://research.missouri.edu/about/files/ramp-down-letter.pdf>

³University of Missouri. (2020). *Euthanasia Record. Laboratory Animal Research Core Hospital Hill Facility*. <https://www.peta.org/wp-content/uploads/2021/01/2020-March-June-Euthanasia-Records-University-of-Missouri.pdf>

- by the applicant have available to them instruction or training in the ... use of *research or testing methods that limit the use of animals* or limit animal distress.”⁴ [*Emphasis added*]
- The National Institutes of Health Revitalization Act of 1993 states, “The Director of NIH ... shall prepare a plan ... for the National Institutes of Health to conduct or support research into ... *methods of such research and experimentation that reduce the number of animals used in such research.*”⁵ [*Emphasis added*]
 - The eighth edition of the *Guide for the Care and Use of Laboratory Animals* states, “The *Guide* ... endorses the following principles: *consideration of alternatives (in vitro systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals.*”⁶ [*Emphasis added*]
 - The U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training (1985) states, “The animals selected for a procedure should be of an appropriate species and quality and *the minimum number required to obtain valid results.*”⁷ [*Emphasis added*]

When UM experimenters buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed to be unnecessary, non-essential, noncritical, extraneous or described using similar terminology, they squander limited research funds, some of which is likely provided by Missouri taxpayers, and flout the bedrock “3Rs” principle of reducing, replacing, and refining the use of animals in experimentation that is enshrined in government regulations and policies.

Under this standard, the number of unnecessary, non-essential, noncritical, or extraneous animals used in the aforementioned experiments should have been zero from the start since they weren’t relevant to the protocols led by UM’s employees. Also, since state taxpayer funds were likely used to acquire, breed, confine, and/or maintain these unnecessary, non-essential, noncritical, or extraneous animals who were then so easily euthanized and disposed of in response to COVID-19, UM should reimburse the state of Missouri for this fiscal waste.

Furthermore, as the Congressional Research Service (CRS) 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

⁴Health Research Extension Act of 1985, Publ. L. No. 99-158. (1985). <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

⁵NIH Revitalization Act of 1993, Publ. L. No. 103-43. (1993). <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

⁶National Research Council 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*. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>

⁷National Research Council Committee for the Update of the Guide for the Care and Use of Laboratory Animals. (2011). *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/>

populations.”⁸ Missouri taxpayers should not be responsible for any of the additional costs associated with “reestablishing laboratory animal populations” since UM deemed many of them to be unnecessary, non-essential, noncritical, or extraneous to the experiments and because repopulating animals in laboratories at taxpayers’ expense would appear to violate the aforementioned federal regulations and policies that mandate minimizing the use of animals in experiments.

Request for Research Accountability

This information seems to corroborate the apparent waste of state funds by UM on activities supporting experiments—and/or on the animals used in them—that the school deemed unnecessary, extraneous, noncritical, non-essential, ramped down, disposable, or nonpriority or described using similar terminology and euthanized in response to COVID-19. Such seeming waste of precious resources by UM does a disservice to the research enterprise, Missouri taxpayers, and the animals who paid for this with their lives.

We urge you to audit UM’s actions in this matter and, if you corroborate the issues we have raised, hold the university accountable by requiring it to reimburse Missouri for apparent fiscal waste of state taxpayer funds with respect to the university’s animal experiments, and also ensuring 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.

We will share with your office any new, relevant information we receive on this regard. If you have any questions, please contact me at ShalinG@peta.org or at 757-962-8325. 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

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>