



PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

February 17, 2021

Danny Jacobs, M.D., M.P.H., FACS  
President  
Oregon Health & Science University  
3181 S.W. Sam Jackson Park Road  
Portland, OR 97239-3098

Via e-mail: [jacobsda@ohsu.edu](mailto:jacobsda@ohsu.edu)

Dear President Jacobs:

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 presented below, we urge Oregon Health & Science University (OHSU) to reimburse any and all federal and state funds used to acquire, breed, confine and/or maintain the animals used in experiments whom OHSU 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.**

### **Euthanizing Unnecessary Animals in OHSU Experiments Wastes Taxpayer Funds**

According to documents obtained by PETA through FOIA requests, animals assigned to the following OHSU protocols were deemed extraneous and killed in response to the university's transition to "modified operations" on March 23, 2020.<sup>1</sup>

- The protocol titled, "Characterizing Patient-Specific Tbr1 Mutations: Understanding a Master Regulator of Autism Risk," led by OHSU's Brian O'Roak, received \$499,244 in FY2020 from the National Institute Mental Health (NIMH).<sup>2</sup> In this experiment, mice are bred so that experimenters can induce genetic mutations causing brain developmental disorders, after which newly weaned pups are subjected to stressful physical, motor and behavioral tasks.<sup>3</sup>
- The protocol titled, "Role of Base Excision Repair in Limiting Hepatocellular Carcinomas," and, "The Roles Of BER And TLS in Limiting Aflatoxin-Induced Carcinogenesis," led by OHSU's

<sup>1</sup> OHSU. (n.d.). *Research and Innovation*. <https://www.ohsu.edu/research-innovation>

<sup>2</sup>NIH. (n.d.). *Characterizing Patient-Specific Tbr1 Mutations: Understanding a Master Regulator of Autism Risk: 5R01MH113926-04*. Research Portfolio Online Reporting Tools (RePORT): Project Information. *Funded from 2017*.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9929658&icde=53561143](https://projectreporter.nih.gov/project_info_details.cfm?aid=9929658&icde=53561143)

<sup>3</sup> eIACUC. (2021, January 6). *Advanced genome editing for new molecular models of autism (TR01\_IP0000077)*. [https://www.peta.org/wp-content/uploads/2021/02/IP00077\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/IP00077_Redacted.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.)

Stephen Lloyd, received \$357,057 in FY2021<sup>4</sup> and \$308,000 in FY2017,<sup>5</sup> respectively, from the National Institute of Environmental Health Sciences (NIEHS). These experiments involve injecting mice with liver cancer-causing toxins.<sup>6</sup>

- The protocol titled, “Development of Novel Therapeutics for Leishmaniasis,” led by OHSU’s Scott Landfear, received \$446,184 in FY2021 from the National Institute of Allergy and Infectious Diseases (NIAID).<sup>7</sup> In this experiment, mice are infected with varying loads of the Leishmania parasite and injected with different drugs.<sup>8</sup>

Following these painful experiments, the mice are to be euthanized either by decapitation or prolonged exposure to carbon dioxide. Correspondence with OHSU confirms that animals assigned to aforementioned protocols were euthanized due to COVID-19.<sup>9,10</sup> The fact that laboratories led by OHSU’s employees had animals it deemed non-essential in the first place should raise significant red flags, especially since their experiments are funded by taxpayers who should not have to foot the bill for such waste.

### **OHSU Protocols Apparently Failed of to Reduce and Replace Animal Use**

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

NIH-supported language requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the NIH 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 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 [*emphasis added*].”<sup>11</sup>

---

<sup>4</sup> NIH. (n.d.). *Role of Base Excision Repair in Limiting Hepatocellular Carcinomas: 5R01ES031086-02*. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=10077479&icde=53581431](https://projectreporter.nih.gov/project_info_details.cfm?aid=10077479&icde=53581431)

<sup>5</sup> NIH. (n.d.). *The Roles Of BER And TLS in Limiting Aflatoxin-Induced Carcinogenesis: 1R56ES027632-01A1*. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=9527499&icde=53581510](https://projectreporter.nih.gov/project_info_details.cfm?aid=9527499&icde=53581510)

<sup>6</sup> eIACUC. (2021, January 6). *Role of Base Excision Repair following Oxidative Stress (TR01\_IP00000145)*. [https://www.peta.org/wp-content/uploads/2021/02/IP00145\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/IP00145_Redacted.pdf)

<sup>7</sup> NIH. (n.d.). *Development of Novel Therapeutics For Leishmaniasis: 5R33AI127591-05*. Research Portfolio Online Reporting Tools (RePORT): Project Information.

[https://projectreporter.nih.gov/project\\_info\\_details.cfm?aid=10059160&icde=53581610](https://projectreporter.nih.gov/project_info_details.cfm?aid=10059160&icde=53581610)

<sup>8</sup> eIACUC. (2021, January 6). *Delivery of Synthetic Organic Compounds as Broad Spectrum Anti- Parasitic Drugs (TR01\_IP00000383)*. [https://www.peta.org/wp-content/uploads/2021/02/IP00383\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/IP00383_Redacted.pdf)

<sup>9</sup> Kuske, R. (2021, February 9). *Response to PETA's 2/3/21 amended request*. <https://www.peta.org/wp-content/uploads/2021/02/2021-02-09-Responsive-docs-sent-in-previous-FOIA.pdf>

<sup>10</sup> Kuske, R. (2021, February 11). *Response to PETA's 08/28/20 & 12/16/20 requests*. <https://www.peta.org/wp-content/uploads/2021/02/Response-to-PETAs-082820-121620-requests.pdf>

<sup>11</sup> Health Research Extension Act of 1985, Publ. L. No. 99-158. (1985). <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

- 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 [emphasis added]*.”<sup>12</sup>
- 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 [emphasis added]*.”<sup>13</sup>
- 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 [emphasis added]*.”<sup>14</sup>

When OHSU 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, much of which are provided by 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 OHSU’s employees. Also, because taxpayer funds were 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, OHSU should reimburse the funding agencies for this fiscal waste.

Furthermore, 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 populations.”<sup>15</sup> Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations” since OHSU 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 and Modernization**

We urge you to withdraw the referenced funds allocated to support these OHSU laboratories and reimburse the state and federal agencies with any and all funds used to acquire, breed, confine and/or maintain the animals who experimenters deemed unnecessary, non-essential, noncritical, extraneous or described using similar terminology and then euthanized on the months of March,

---

<sup>12</sup>NIH Revitalization Act of 1993, Publ. L. No. 103-43. (1993). <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

<sup>13</sup>National 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>

<sup>14</sup>National 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/>

<sup>15</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>

16,17,18,19,20,21,22,23,24,25 May,<sup>26</sup> and June<sup>27</sup> 2020 in response to the university's modified operations for COVID-19. Moreover, instead of supporting wasteful experiments on animals that do not advance human health, we encourage OHSU to shift its efforts to projects focused on human-relevant, non-animal research methods, as described in PETA's Research Modernization Deal.<sup>28</sup>

You can contact me at [ShalinG@peta.org](mailto: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

---

<sup>16</sup> OHSU (n.d.). *Euthanized due to COVID-19*. [https://www.peta.org/wp-content/uploads/2021/02/Euthanized-due-to-COVID-19\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Euthanized-due-to-COVID-19_Redacted.pdf)

<sup>17</sup> OHSU (n.d.). *Lab Public Records Request 1*. [https://www.peta.org/wp-content/uploads/2021/02/Lab\\_PublicRecordsRequest\\_Page1\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Lab_PublicRecordsRequest_Page1_Redacted.pdf)

<sup>18</sup> OHSU (n.d.). *Lab Public Records Request 2*. [https://www.peta.org/wp-content/uploads/2021/02/Lab\\_PublicRecordsRequest\\_Page2\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Lab_PublicRecordsRequest_Page2_Redacted.pdf)

<sup>19</sup> OHSU (n.d.). *Mouse Report*. [https://www.peta.org/wp-content/uploads/2021/02/Mouse-report-combined\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Mouse-report-combined_Redacted.pdf)

<sup>20</sup> OHSU (n.d.). *Mice Euthanized for Shutdown*. [https://www.peta.org/wp-content/uploads/2021/02/miceeuthanizedforshutdown\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/miceeuthanizedforshutdown_Redacted.pdf)

<sup>21</sup> OHSU (n.d.). *Tbr1- Mouse Master List*. [https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List_Redacted.pdf)

<sup>22</sup> OHSU (n.d.). *Tbr1 Mouse List Line-1*. [https://www.peta.org/wp-content/uploads/2021/02/Line-1\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Line-1_Redacted.pdf)

<sup>23</sup> OHSU (n.d.). *Tbr1 Mouse List Line-2*. [https://www.peta.org/wp-content/uploads/2021/02/Line-2\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Line-2_Redacted.pdf)

<sup>24</sup> OHSU (n.d.). *Tbr1 Mouse List Line-3*. [https://www.peta.org/wp-content/uploads/2021/02/Line-3\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Line-3_Redacted.pdf)

<sup>25</sup> OHSU (n.d.). *Tbr1 Mouse List Line-4*. [https://www.peta.org/wp-content/uploads/2021/02/Line-4\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Line-4_Redacted.pdf)

<sup>26</sup> OHSU (n.d.). *Tbr1- Mouse Master List*. [https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List_Redacted.pdf)

<sup>27</sup> OHSU (n.d.). *Tbr1- Mouse Master List*. [https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List\\_Redacted.pdf](https://www.peta.org/wp-content/uploads/2021/02/Tbr1-Mouse-Master-List_Redacted.pdf)

<sup>28</sup> People for the Ethical Treatment of Animals. (2021). *The Research Modernization Deal 2021*. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>