



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

March 15, 2021

David M. Dooley, Ph.D.
President
University of Rhode Island

Via e-mail: davedooley@uri.edu

Dear Dr. Dooley:

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 to follow up on our letter to you dated April 8, 2020,¹ and to share some troubling new information that we have obtained. **Based on the information presented below, we urge the University of Rhode Island (URI) to reimburse any and all federal and state funds used to acquire, breed, confine, and/or maintain the animals used in experiments whom URI categorized as noncritical, unnecessary, non-essential, extraneous, ramped down, disposable, or nonpriority or described using similar terminology and—according to new documents obtained by PETA through Rhode Island Access to Public Records Act (APRA) requests—euthanized in response to COVID-19, contrary to URI's public denial of this practice last year.**²

Euthanizing Unnecessary Animals in URI Experiments Wastes Taxpayer Funds

According to new documents obtained by PETA through APRA requests, animals assigned to the following protocols were killed in response to a directive issued by URI amid the COVID-19 pandemic in which the university instructed staff to “draw down [their] research and campus-based scholarly activities”³ and stated that “[n]on-critical research should be curtailed as much as possible”⁴—both of which led to the apparent destruction of animals deemed extraneous by URI:

- “Surgical Cardioprotection Through BKCA-Dependent Modulation of Mitochondrial Supercomplexes,” led by URI's Richard Clements,

¹People for the Ethical Treatment of Animals. (2020). *Urgent Request to University of Rhode Island*. <https://www.peta.org/wp-content/uploads/2020/04/COVID-19-Urgent-Request-to-University-of-Rhode-Island-04082020.pdf>

²Nunes R. (2020, Sept. 15). URI fires back against “baseless” animal euthanasia allegations. *Patch*. <https://patch.com/rhode-island/narragansett/uri-fires-back-against-baseless-animal-euthanasia-allegations>

³University of Rhode Island. (n.d.). *COVID-19 Laboratory Research*. <https://web.uri.edu/research-admin/externalrelations/news/covid-19-laboratory-research/>

⁴University of Rhode Island. (n.d.). *Research Resumption Plan*. <https://web.uri.edu/research-admin/externalrelations/news/transition-from-phase-2-to-phase-3-uri-research-resumption-plan/>

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received \$164,428 in FY2019 from the National Heart, Lung, and Blood Institute.^{5,6} Related e-mail correspondence involving a university research technician mentions “culling old breeders,”⁷ referring to euthanizing elderly animals.

- “Epidermal Powder Drug/Vaccine Delivery via Skin Microchannels”⁸ is led by URI’s Xinyuan Chen, who called for a “plan to euthanize [mice] and only keep a few for breeding purposes.”⁹
- “Maintenance of FXR and ERalpha-Knockout Mouse Breeding Colony”¹⁰ is led by a URI experimenter (name redacted). Correspondence among university staff revealed that experimenters euthanized 14 mice on this protocol and plans are/were in place to euthanize 13 cages of mice on this protocol to reduce the number of animals being maintained.¹¹

URI’s “Lab Animal COVID-19 Emergency Procedures” guideline gave explicit instructions regarding the culling of animals deemed extraneous in response to COVID-19, telling experimenters to “[e]uthanize all old breeders,” “[c]onsider euthanizing males if there are several of the same strain,” and “[e]uthanize or separate extra breeders.”¹²

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

URI Protocols Apparently Failed to Reduce and Replace Animal Use

The presence of unnecessary, noncritical, non-essential, or extraneous animals in URI 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:

⁵NIH. (n.d.). *Surgical Cardioprotection Through BKCA-Dependent Modulation of Mitochondrial Supercomplexes*. Project Number: 5R01HL135236-02. Research Portfolio Online Reporting Tools (RePORT): Project Information. https://projectreporter.nih.gov/project_info_details.cfm?aid=9744774&icde=53799442

⁶University of Rhode Island. (n.d.). *APRA Documents—Records From URI 4 Research Protocols*. IACUC Protocol # AN1920-007. https://www.peta.org/wp-content/uploads/2021/03/2021-02-16-Records-from-URI-4-research-protocols.msg_pdf

⁷University of Rhode Island. (n.d.). *APRA Documents—Email Correspondences*. Sub: F333/Protocol AN 1920-007 /Weaning Errors. <https://www.peta.org/wp-content/uploads/2021/03/20201231122934309.pdf>

⁸University of Rhode Island. (n.d.). *APRA Documents—Records From URI 4 Research Protocols*. IACUC Protocol # AN1415-009. https://www.peta.org/wp-content/uploads/2021/03/2021-02-16-Records-from-URI-4-research-protocols.msg_pdf

⁹University of Rhode Island. (n.d.). *APRA Documents—Email Correspondences*. Sub: RE: COVID-19—ANIMAL WELFARE—PLEASE READ—ACTION REQUIRED. <https://www.peta.org/wp-content/uploads/2021/03/20201231122934309.pdf>

¹⁰University of Rhode Island. (n.d.). *APRA Documents—Records From URI 4 Research Protocols*. IACUC Protocol #AN12-01-013. https://www.peta.org/wp-content/uploads/2021/03/2021-02-16-Records-from-URI-4-research-protocols.msg_pdf

¹¹University of Rhode Island. (n.d.). *APRA Documents—Email Correspondences*. Sub: Re: COVID-19 Emergency Procedures/ Colony Management. <https://www.peta.org/wp-content/uploads/2021/03/20201231122934309.pdf>

¹²University of Rhode Island. (n.d.). *APRA Documents—Lab Animal COVID-19 Emergency Procedures*. <https://www.peta.org/wp-content/uploads/2021/03/20201231122934309.pdf>

- 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*].¹³
- 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*].¹⁴
- 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*].¹⁵
- 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*].¹⁶

When URI experimenters buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, noncritical, non-essential, or 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, noncritical, non-essential, 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 URI’s employees. Also, because taxpayer funds were used to acquire, breed, confine, and/or maintain many of these unnecessary, noncritical, non-essential, or extraneous animals who were then so easily euthanized and disposed of in response to COVID-19, URI should reimburse the funding agencies for this fiscal waste.

Furthermore, the Congressional Research Service has found that during the COVID-19 pandemic, “Suspending 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.”¹⁷ Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations” since URI

¹³Health Research Extension Act of 1985, Publ. L. No. 99–158. (1985). <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

¹⁴NIH Revitalization Act of 1993, Publ. L. No. 103–43. (1993). <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

¹⁵National 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>

¹⁶National 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/>

¹⁷Congressional Research Service. (2020, April 10). *Effects of COVID-19 on the federal research and development enterprise*. <https://crsreports.congress.gov/product/pdf/R/R46309>

deemed many of them to be unnecessary, noncritical, non-essential, or extraneous to the experiments and because repopulating animals in laboratories at the taxpayers' expense would appear to violate the aforementioned federal regulations and policies that mandate the minimization of animal use in experiments.

Request for Research Accountability and Modernization

We urge you to withdraw the referenced funds allocated to support these URI laboratories and reimburse the state and federal agencies with any and all funds used to acquire, breed, confine, and/or maintain the animals experimenters deemed unnecessary, noncritical, non-essential, or extraneous or described using similar terminology and then euthanized because of the university's COVID-19 response directive. Moreover, instead of supporting wasteful experiments on animals that don't advance human health, we encourage URI to shift its efforts to projects focused on human-relevant, non-animal research methods, as described in PETA's Research Modernization Deal.¹⁸

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

Sincerely yours,

A handwritten signature in black ink that reads "Shalin G. Gala". The signature is written in a cursive style with a large, sweeping initial "S" that loops under the rest of the name.

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

¹⁸People 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>