



August 29, 2016

Dr. Daphna Sessler
Dr. Alona Konovalenko
Veterinarian Inspectors
National Council for Animal Experimentation

Via e-mail: julis@netvision.net.il, Alyona.kon@gmail.com

Dear Drs. Sessler and Konovalenko,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 5 million members and supporters to respectfully request that your office investigate possible noncompliance with the Prevention of Cruelty to Animals Law (Experiments on Animals) 5761-2001 and the *Guide for the Care and Use of Laboratory Animals* (“the *Guide*”), published by the National Research Council of the United States (NRC) and adopted by the Israeli Minister of Health’s Council for Experiments on Animals as the “NRC Rules” that govern the housing and care of animals in laboratories. I have copied Dr. Axel Wolff on this correspondence as the institution in question holds a Public Health Assurance with the U.S. National Institutes of Health (PHS Assurance A5010-01) and is therefore obligated to comply with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy).

PETA was recently contacted by a whistleblower who attested to, and provided photographic and videographic documentation for, the following problems at the Meier Segals Garden for Zoological Research at Tel Aviv University that allegedly occurred in July and August of this year:

1. Failure to ensure animals are housed within appropriate temperature ranges;
2. Failure to ensure adequate ventilation of animal enclosures;
3. Failure to provide adequate space to animals;
4. Failure to provide potable, uncontaminated drinking water to animals;
5. Failure to maintain enclosures in a manner that ensures the animals’ health and well-being, including failure to ensure adequate cleaning and disinfection of enclosures;
6. Failure to maintain a program of adequate veterinary care; and
7. Failure to provide humane euthanasia to animals as a means to relieve pain or distress.

I. Failure to ensure appropriate temperature range

The *Guide* stipulates that: “Animals should be housed within temperature and humidity ranges appropriate for the species, to which they can adapt with minimal stress and physiologic alteration” and further recommends that the room temperature for mice, rats, hamsters, gerbils, and guinea pigs should be set

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between 20 and 26 degrees Centigrade.¹ However, the whistleblower alleges that in the breeding colonies where rats, mice, gerbils, degus, and other animals are bred to supply the research needs of Tel Aviv University, animals are held in dangerously hot conditions, with temperatures soaring to 38 degrees C. The whistleblower believes that the temperature in the enclosures is likely even higher.

II. Failure to ensure adequate ventilation

The *Guide* is clear in emphasizing the importance of ventilation: “The primary purpose of ventilation is to provide appropriate air quality and a stable environment. Specifically, ventilation provides an adequate oxygen supply; removes thermal loads caused by the animals, personnel, lights, and equipment; dilutes gaseous and particulate contaminants including allergens and airborne pathogens; adjusts the moisture content and temperature of room air; and, where appropriate, creates air pressure differentials (directional air flow) between adjoining spaces. Importantly, ventilating the room (i.e., the macroenvironment) does not necessarily ensure adequate ventilation of an animal’s primary enclosure (i.e., the microenvironment), that is, the air to which the animal is actually exposed.”² However, the whistleblower reports that many of the cages in which animals are housed have three solid walls, constructed of glass or metal, with only the front panel permitting the flow of air through a wire hatch. The accumulated heat resulting from the hot temperatures noted earlier and the minimal ventilation contribute to the animals’ distress. The whistleblower alleges that many animals cluster close to the wire hatch—perhaps to escape the suffocating heat in the interior of the cage.³

III. Failure to provide adequate space to animals

The *Guide* mandates that: “All animals should be housed under conditions that provide sufficient space as well as supplementary structures and resources required to meet physical, physiologic, and behavioral needs.”⁴ However, the whistleblower reports that many cages housing animals at the Meier Segals research center are overcrowded. Animals are held in cramped conditions that appeared to be stressful to them. The whistleblower alleges that the cages that confine spiny mice and degus contain as many as 30 animals in a space no larger than an A4 sheet of paper, while the mouse cages are the most overcrowded, containing up to 50 animals. In some enclosures containing mice, there are multiple litters of mice.⁵

IV. Failure to provide potable, uncontaminated drinking water to animals

The *Guide* mandates that: “Animals should have access to potable, uncontaminated drinking water according to their particular requirements.”⁶ However, the whistleblower alleges that rats, mice, gerbils, degus, and other animals at the Meier Segals research center are frequently deprived of drinking water. The whistleblower estimates that only about 20 percent of the cages have water bottles for the animals, and that in cases where water bottles are provided, many of

¹ National Research Council (NRC), *The Guide for the Care and Use of Laboratory Animals (Eighth Edition)*, National Academy Press, Washington, DC, 2011. Page 43.

² NRC 46.

³ Please see Photo 1.

⁴ NRC 50.

⁵ Please see Photos 2 and 3 and Video 1.

⁶ NRC 67.

the bottles are green with algae. When the whistleblower asked employees at the facility about the lack of water for the animals, they responded that the animals receive enough water from the fruit they are fed. While this is a prima facie case of noncompliance with the *Guide*, the discomfort and distress to the animals brought on by the absence of drinking water is further exacerbated by the hot macro- and microenvironments in which the animals are housed and the lack of ventilation in the animals' cages.

V. Failure to maintain enclosures in a manner that ensures the animals' health and well-being

The *Guide* recommends that facilities ensure “the maintenance of environmental conditions conducive to health and well-being [of animals]—involv[ing] bedding change (as appropriate), cleaning and disinfection.”⁷ The *Guide* further advises that “cleaning removes excessive amounts of excrement, dirt, and debris, and disinfection reduces or eliminates unacceptable concentrations of microorganisms”—with the goal of the sanitation program being “to maintain sufficiently clean and dry bedding, adequate air quality, and clean cage surfaces and accessories.”⁷

Additionally, the *Guide* specifies that:

The primary enclosure should provide a secure environment that does not permit animal escape and should be made of durable, nontoxic materials that resist corrosion, withstand the rigors of cleaning and regular handling, and are not detrimental to the health and research use of the animals. The enclosure should be designed and manufactured to prevent accidental entrapment of animals or their appendages and should be free of sharp edges or projections that could cause injury to the animals or personnel. It should have smooth, impervious surfaces with minimal ledges, angles, corners, and overlapping surfaces so that accumulation of dirt, debris, and moisture is minimized and cleaning and disinfecting are not impaired. All enclosures should be kept in good repair to prevent escape of or injury to animals, promote physical comfort, and facilitate sanitation and servicing. Rusting or oxidized equipment, which threatens the health or safety of animals, needs to be repaired or replaced.⁸

However, the whistleblower alleges that animals' cages are so filthy that they are teeming with maggots, flies and other insects.⁹ Along with accumulated animal waste—in some cases, nearly six inches of accumulated animal droppings—the whistleblower found assorted detritus in the animals' enclosures, including rusty nails and broken pieces of wood. Animal dander and fur has accumulated on the cage wires.¹⁰ Where there is bedding, it is soaked with urine and some bedding has turned nearly solid as a result of the filth. The whistleblower writes: “The stench is unbelievable, more like that of a public rubbish bin than a living space. While attempting to clean the back walls of some of the cages, I could not breathe due to the severe ammonia smell and dust particles in the air. According to the cage cleaning records, the breeding cages had not been cleaned since December.”

The whistleblower further alleges that many of the cages at the Meier Segals research center are in terrible disrepair with sharp edges that can injure the animals and that the wire grates on the front panels of several cages have become very sharp, possibly as a result of animals gnawing on

⁷ NRC 69.

⁸ NRC 51.

⁹ Please see Video 2.

¹⁰ Please see Photos 4, 5 and 6.

the wire. The whistleblower further reports that many of the cages are rusted in portions and that the lid of one cage that housed a lone gerbil was so rusted that it could not be fully opened.

VI. Failure to maintain a program of adequate veterinary care

The *Guide* specifies that: “Veterinary care is an essential part of an animal care and use program. ... This responsibility extends to monitoring and promoting animal well-being at all times during animal use and during all phases of the animal’s life. ... [A] veterinary program that offers a high quality of care and ethical standards must be provided, regardless of the number of animals or species maintained.”¹¹

According to the whistleblower, many animals at the Meier Segals research center suffer injuries but are not given veterinary care. In one case, an injured animal (either a degus or a spiny mouse) had a wound on his leg that was so deep that the whistleblower could see the animal’s bone. The animal was in this condition for the four weeks during the months of July and August of this year that the whistleblower was at the facility. The animal barely moved and stayed near the front of the cage. The staff could see the animal’s injury, but no treatment was provided to the animal.¹²

In another case, a gerbil who was housed alone had sustained an open wound on his head, but was deprived of veterinary care. The gerbil’s skin appeared to be terribly sore and damaged, possibly due to the cage being filthy and full of sharp edges. The whistleblower reported the gerbil was very thin, in distress, struggling to breathe, in failing health, moving very little and seeming to have compromised eyesight, but no care was provided.¹³

VII. Failure to provide humane euthanasia to animals as a means to relieve pain or distress

The *Guide* defines euthanasia as “the act of humanely killing animals by methods that induce rapid unconsciousness and death without pain and distress” and further advises that euthanasia may be necessary “as a means to relieve pain or distress that cannot be alleviated by analgesics, sedatives, or other treatments” and should be “carried out in a manner that avoids animal distress.”¹⁴

However, the whistleblower alleges that in some enclosures, the rotting bodies of animals who had died—presumably after succumbing to the deleterious impacts of substandard housing and care at Meier Segals research center—were left in the cages with animals who were still alive. These animals had been denied the benefit of humane euthanasia. However, even the animals who are killed at Meier Segals research center may not be killed in a manner that minimizes pain and distress. The whistleblower alleges that when overcrowding of cages at Meier Segals becomes particularly egregious, the “excess” animals are gassed to death in large numbers. The whistleblower reports witnessing piles of gassed animals, some of them still moving under piles of their dead family members. According to the whistleblower, unwanted neonatal animals are simply left out in the heat to die.

¹¹ NRC 105.

¹² Please see Photo 7.

¹³ Please see Video 3.

¹⁴ NRC 123.

We urge you to investigate the concerns summarized in this letter and, if the claims are substantiated, to take swift and decisive action against Tel Aviv University.

If you have any questions, please contact me at 202-829-0974 or AlkaC@peta.org. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Alka Chandna". The signature is written in a cursive, flowing style.

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Encl.: [Photos 1 – 7](#)
[Videos 1 – 3](#)

Cc: Dr. Axel Wolff, Director, Office of Laboratory Animal Welfare, U.S. National Institutes of Health