



July 6, 2021

Christina Paxson
President
Brown University
Box 1860
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Via e-mail: president@brown.edu; diane_hoffman-kim@brown.edu

Dear President Paxson,

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters with a respectful request: that you take personal responsibility in addressing chronic and egregious animal welfare violations in Brown University's laboratories. PETA wrote to your office four years ago to ask that you address the pattern of neglect, incompetence, and disregard that characterized the treatment of vulnerable animals in the school's laboratories. However, the problems persist and animals continue to suffer there.

In particular, PETA has obtained documents revealing flagrant, ongoing violations of federal animal welfare guidelines in Brown's laboratories. Among other incidents, employees' negligence resulted in the starvation deaths of eight mice and the dehydration deaths of 12 additional mice. Experimenters failed to euthanize animals in a timely manner, resulting in exacerbated suffering for the animals. In one case, after experimenters ignored a veterinary technician's directive to euthanize a mouse, the animal was found in a moribund state—likely with labored breathing, sunken eyes, and impaired mobility resulting in an inability to reach food or water. In another incident, a mouse was found with a tumor exceeding the university's own size limits. This likely would have resulted in worsened pain and distress and may have reduced the mouse's ability to walk.

Several experimenters deviated from the protocols that had been approved by the university's Institutional Animal Care and Use Committee (IACUC)—suggesting systemic problems in the school's experimentation program, since IACUCs are intended to serve as the last line of defense for animals who are held in laboratories and used in experiments that may cause pain, discomfort, and distress and that almost always end in the animals' death. Experimenters failed to monitor animals after they'd been used in a surgery, and one failed to provide "thermal support" to help relieve their pain. In a separate incident, an experimenter injected a substance into mice's feet without first securing the IACUC's approval. The mice were found to have significant footpad swelling in their hind feet and had to be euthanized.

After a mouse was gassed with carbon dioxide, the technician failed to ensure that the animal was dead—and other laboratory workers found that mouse alive, in a refrigerator intended for dead animals. I ask that you pause to consider what it must have been like for that mouse to recover from the gassing, only to wake

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up surrounded by the dead and frozen bodies of other mice. In another incident, nearly 300 mice were killed using a method inconsistent with guidelines stipulated by the American Veterinary Medical Association. The actual method of killing was not specified in the documents. (Were their necks broken? Were their heads cut off with scissors? Was a guillotine used?) We can only imagine the pain and anguish experienced by these *hundreds* of mice. Likewise, tissue was collected from genetically modified mice using methods inconsistent with the school's policy and the IACUC-approved protocol. Again, the method of tissue collection was not specified in the documents—leaving people concerned about animal welfare to speculate on the colossal failure.

Brown University also failed to provide animals in its laboratories with safe housing. In one incident, seven mice escaped from their cage as a result of a missing grommet. Four mice were recovered, and of these, one had to be euthanized. The other three mice were never found. In another incident, experimenters failed to separate mice to ensure that cages did not become severely crowded. One cage contained 24 weaned mice and two newborn litters. This was a repeat violation in this particular laboratory.

In all, the records reveal 23 violations between March 2019 and April 2021—nearly one violation per month. Such problems will continue unless a strong deterrent is implemented. Principal investigators must be informed that if federal animal welfare regulations or guidelines are violated in connection with their laboratories, the IACUC will withdraw approval for the protocol and also revoke animal experimentation privileges from the investigator. Moreover, there must be a zero-tolerance policy for investigators and their staff who fail to comply with directives from veterinary staff—as well as a zero-tolerance policy for animal husbandry staff who fail to provide animals with food or water.

Brown University received more than \$127 million in taxpayer money from the National Institutes of Health in 2020, and an estimated half of that money was allocated to experiments on animals. Funding agencies—and the public—expect that with the provision of such funding, institutions will comply with minimal federal animal welfare regulations and guidelines. Brown's failures represent an abject violation of the public's trust—and we ask that you make haste in addressing this serious matter.

I am available to discuss this matter with you and can be reached at 757-803-6447 or AlkaC@peta.org. Thank you for your time.

Sincerely,



Alka Chandna, Ph.D.
Vice President
Laboratory Investigations Cases

cc: Diane Hoffman-Kim, IACUC Chair