

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

July 15, 2021

Robert J. Manning  
Chair  
Board of Trustees  
University of Massachusetts—Amherst

Via e-mail: [rmanning@umassp.edu](mailto:rmanning@umassp.edu)

Dear Mr. Manning:

I'm following up on my letter of February 1 to share additional concerns regarding the intransigent position taken by Chancellor Kumble Subbaswamy and other University of Massachusetts—Amherst (UMass) officials in their refusal to modernize the university's research program or take even minimal steps to improve animal welfare at the school. As you know, a UMass patron—concerned by the school's use of nonhuman primates in experiments—brokered a meeting in July 2020 of three PETA scientists with Chancellor Subbaswamy and Vice Chancellor Michael Malone to discuss specific ways in which the university could modernize its biomedical research program and reduce its use of animals in experiments.

Shortly after the meeting, Chancellor Subbaswamy abruptly shut down communications with PETA, which prompted us to request documents from the university related to that meeting. We also submitted a Freedom of Information Act request to the National Institutes of Health (NIH) for reports documenting violations of federal animal welfare regulations and guidelines in UMass' laboratories. The documents obtained from the school reveal that its officials had no interest in meaningfully engaging with the scientific information that we presented and no interest in modernizing its research program. The documents obtained from NIH expose the extent to which incompetence, neglect, and an unwillingness or inability to comply with minimal animal welfare standards have resulted in pain and misery for animals in UMass' laboratories.

### **Internal Documents Obtained by PETA Reveal UMass Officials' Dishonesty and Outmoded Thinking**

The documents reveal that the university sought advice from two organizations that exist solely to promote the use of animals in experimentation and undercut any humane reforms encouraged by

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- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

animal protection organizations. These two groups function to keep animal protectionists from making any progress toward replacing animals in experiments—even if better methods are available—and to defeat any legislation that would limit animal experimentation. In their communications to UMass, these organizations provided disparaging and false information about PETA’s scientists while also mischaracterizing the work that we do.

The documents also reveal that UMass officials felt that they had to engage with PETA because of the involvement of the patron but that they never intended to consider the evidence presented by our scientists. Prior to the meeting, Chancellor Subbaswamy agreed that Tricia Serio, dean of the College of Natural Sciences—who was crucial to the discussion because she oversees the marmoset experiments—could be “suddenly” unavailable on the day of the meeting.

After the meeting, there was no discussion about the merits of the suggestions made by our scientists and no discussion about implementing them—not even one sentence. Chancellor Subbaswamy acknowledged the professionalism and credentials of our scientists, writing that “PETA folks were totally professional and polite during the entire meeting” and that “[a]ll three PETA attendees have scientific credentials and two of them have done long years of work in industry or university/field.” But there was *no* discussion about the points that we had made and whether or not they should be considered. Although the correspondence spans from June 2020 to February 2021, there’s no further mention of marmosets, antibodies, or tick-borne diseases, all of which were discussed at the meeting.

Lastly, the documents include communications between UMass officials about how to get rid of PETA. Dr. Amy Clippinger, Vice President of Regulatory Testing at PETA, who was unaware that UMass met us in bad faith, followed up with Chancellor Subbaswamy several times, until Michelle Goncalves (in the public policy division) e-mailed him: “Chancellor, she’s going to keep emailing until we respond. Would it be helpful to send something like the message below?” The chancellor then sent to Clippinger the e-mail that Goncalves had drafted: “We have taken the issues raised seriously and conducted another review of our policies and practices. Based on this review, I am confident that animal models are used in research only when there is no other known approach to address the research question and then only when extensive federal regulations are satisfied. No follow up meeting will be necessary.” There is no evidence that any such review was done.

### **Federal Reports Obtained by PETA Reveal Chronic, Egregious Problems in UMass Laboratories**

In stark contrast to Chancellor Subbaswamy’s claims regarding UMass’ animal laboratories, federal reports document numerous violations of animal welfare regulations and guidelines that represent minimal standards and considerations. Mice have drowned, birds have starved to death, and zebrafishes have died from overheating in UMass’ laboratories. In one incident, experimenters failed to give necessary pain relief to *several hundred* mice who had just undergone surgery. Hamsters in the school’s laboratories are deliberately bred to develop early heart failure and are left without treatment. The university acknowledges that some of these docile animals become so weak and lethargic that they can’t reach food or water and are forced to eat nutritional gel from the cage floor. In other tests, experimenters leave hamsters in total, constant darkness for days or even weeks at a time. This darkness is punctuated only by periods

in which experiments disorient the animals with flashing lights or shake their cages to disturb their sleep repeatedly and impair their heart function.

### **Conclusion**

At our meeting with Chancellor Subbaswamy and other UMass officials, PETA scientists didn't ask that the university shut down its animal laboratories, although this would make sense both ethically and scientifically. Rather, we presented discrete practices—including alternatives to the use of animals' bodies to produce antibodies and grow ticks—and encouraged UMass to adopt these methods. We also shared information from the National Academies of Sciences, Engineering, and Medicine regarding the plethora of scientific and welfare issues associated with using marmosets in experiments. We'd hoped that our meeting with Chancellor Subbaswamy would be the first of several productive discussions that would result in significant improvements to the quality of research conducted at UMass.

Given the history of animal welfare violations at the university, the well-documented limitations of animal experiments, and the concerns expressed by UMass alumni and donors, it's clear that improvements are needed at the school. I respectfully request that you urge the chancellor to reopen discussions with PETA—this time with the serious goal of modernizing the university's research program.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kath Roe". The signature is fluid and cursive, with the first and last letters of each name being capitalized and prominent.

Katherine V. Roe  
Chief, Science Advancement and Outreach