August 9, 2021

Kathryn A. Bayne, M.S., Ph.D., D.V.M. CEO Association for Assessment and Accreditation of Laboratory Animal Care International 5205 Chairman's Ct., #300 Frederick, MD 21703

Via e-mail: <u>kbayne@aaalac.org</u>

Dear Dr. Bayne:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters worldwide to request that the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC International) revoke the accreditation awarded to the Centers for Disease Control and Prevention (CDC). As you know, there is a long history of gross negligence and rampant incompetence in the agency's animal laboratories that has caused immeasurable pain, misery, and suffering for the animals there. Reports recently uncovered by PETA indicate that the CDC continues to violate minimal federal animal welfare regulations, guidelines, and standards, imperiling the well-being of the vulnerable animals trapped in its laboratories. The incidents catalogued below don't represent the so-called "gold standard" that AAALAC accreditation purportedly signifies. Permitting laboratories such as these to run roughshod over the minimal welfare standards for animals diminishes the value of accreditation.

According to federal documents obtained by PETA through a Freedom of Information Act request, the CDC's failure to comply with federal laws has resulted in agonizing deaths from starvation, dehydration, and asphyxiation. Experimenters have failed to use appropriate experimental methods, failed to monitor animals appropriately, and failed to euthanize animals in accordance with humane endpoints, thereby extending their suffering. Because of these failures, more than 400 mice, rats, hamsters, rabbits, monkeys, and other animals have suffered and died or were otherwise neglected at CDC facilities in Atlanta and Fort Collins, Colorado, between November 2017 and April 2021:

- 1. A mouse died from dehydration after staff members didn't notice that the animal was trapped in a food hopper.
- 2. Two rabbits died after staff members failed to dose an anesthetic properly and failed to administer an "appropriate heat source during recovery from anesthesia."

Page 1 of 3



PETA

Washington

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

Info@peta.org PETA.org

Affiliates:

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

- 3. Seven rats died after staff members administered the wrong dose of anesthetic. The animals received "boosts of anesthesia that was [*sic*] not approved in the protocol."
- 4. In two separate incidents, 177 "unexpected" mice were born because staff members failed to determine the sex of the parent animals, and 68 of them had to be euthanized.
- 5. Six cotton rats died after staff members administered an overdose of anesthetics.
- 6. When placing a cage in an autoclave, a staff member failed to notice that a mouse was still inside and the animal was steamed to death.
- 7. Three mice died from asphysiation after staff members failed to notice that their cage was cracked, which "likely led to a slow buildup of CO₂ in the cage."
- 8. An undetermined number of goats were subjected to plasma collection "as often as every 48 hours" instead of every 30 days, in violation of the approved protocol.
- 9. Two rabbits who weighed less than 3.5 kg each were subjected to a tick infestation. Staff members used three bags of ticks instead of two, in violation of the approved protocol, and one of the rabbits had to be euthanized.
- 10. Four mice were left without food, and one of them starved to death.
- 11. Three sentinel mice were improperly euthanized, and the requisite cervical dislocation procedure wasn't performed.
- 12. A prairie dog had to be euthanized after staff members didn't notice for a week that the animal had sustained wounds in a fight and had consequently lost weight and developed sepsis.
- 13. Fifty-five chicks died—five of them likely from starvation—in two separate incidents, after staff members placed embryonated eggs in incubators instead of refrigerators.
- 14. Four rabbits received intradermal injections that were not described in the approved protocol, and the injection sites became red and swollen.
- 15. Forty-two mice were left without oxygen and four of them died from hypoxia after staff members failed to connect their cages to an air supply.
- 16. A female monkey had a vaginal ring implanted for nearly three years instead of the intended 14 days because staff members failed to find the ring and simply assumed that the monkey had removed it herself. After almost three years, a mass was detected in her body, where the ring was "partially encased in a mineral-like substance."
- 17. Six monkeys were sedated and forced to wear jackets to "protect the research implant site" that were not described in the approved protocol.
- 18. An undetermined number of guinea pigs confined to four cages went without access to water for 48 hours because staff members failed to notice that their Lixit mechanism was defective. One of the animals had to be euthanized.
- 19. A rabbit suffered a seizure after being sedated and was euthanized, and a guinea pig died after receiving an anesthetic. The staff member involved in these incidents didn't inform the veterinarian. It was established that this person was responsible for the "inappropriate administration of anesthesia and monitoring of approximately 30 guinea pigs."
- 20. A mouse was found dead—likely after enduring pain and suffering—two hours after a veterinarian had instructed another staff member to euthanize the animal.

The live animal had been returned to the cage because the euthanasia chamber wasn't working properly.

- 21. A mouse remained alive following an unsuccessful cervical dislocation procedure performed by a staff member.
- 22. Eight guinea pigs were not monitored hourly after their temperature rose above 104.5 degrees, in violation of the approved protocol.
- 23. Nineteen hamsters infected with rabies received a pharmaceutical treatment for which staff members had used "an inappropriate diluent."
- 24. A hamster and a guinea pig were both euthanized with an expired solution, and seven rabbits received expired vitamins.

The several incidents of deviation from protocol and carelessness described above are alarming. The fact that they occurred and probably continue to do so at one of the leading research institutions in the U.S.—and in the world—is profoundly troubling.

As you know, the AAALAC placed the CDC's accreditation on probationary status in 2005 after detecting deficiencies at every level, from basic housekeeping and poor husbandry practices to bad or nonexistent veterinary care. The CDC's blatant negligence resulted in the deaths of six monkeys in three separate events because staff members failed to notice that the animals didn't have access to water, failed to administer the correct combination of medications, and failed to maintain records and communicate properly. In 2014, two monkeys sustained third-degree burns on their arms and backs after CDC employees placed them under intensely hot heating lamps and heating pads for hours and didn't bother to monitor the animals as required. The monkeys were so severely burned that their skin had peeled off and the muscle was sloughing off the bones.

It appears that now, 16 years after its probation in 2005, nothing has changed at the CDC. Animals confined in its laboratories continue to suffer and die by the hundreds because of staff members' sloppiness and flagrant disregard for AAALAC standards. How should Americans expect the CDC to protect them from the worst pandemic in recent history if it can't even ensure that its employees follow the rules? We urge the AAALAC to demonstrate its commitment to animal welfare by revoking the accreditation awarded to the CDC.

Thank you for your attention to this matter. I'd be happy to answer any questions that you may have at MagnoliaM@peta.org.

Sincerely,

Luthellaqualia

Magnolia Martínez, Ph.D. Special Projects Manager Laboratory Investigations Department