



December 7, 2021

Michael Gottesman, M.D.
Deputy Director for Intramural Research
National Institutes of Health

Via e-mail: michael.gottesman@nih.gov

Dear Dr. Gottesman:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally—to follow up on our earlier e-mail of February 7, 2020, to ask that you make haste to address chronic and egregious animal welfare violations inside the National Institutes of Health's (NIH) laboratories.

In our earlier correspondence, we shared serious concerns regarding 31 documented incidents in NIH's intramural facility involving serious violations of federal animal welfare guidelines between January 5, 2018, and October 15, 2019. We urged you to take action to address the chronic and serious violations of animal welfare regulations and guidelines in this facility, but the problems persist and the animals continue to suffer there.

PETA has obtained documents revealing 76 violations of federal animal welfare guidelines in NIH's Maryland facilities—more than three per month—that have occurred since our last correspondence. Among other serious issues that were documented, employee negligence led to the death of a 6-year-old monkey when she asphyxiated while under anesthesia, because experimenters had failed to notice a disconnected oxygen tank. Another monkey strangled to death when he became entangled in a chain inside his cage. Astonishingly, employees' ongoing negligence also resulted in the death of 72 mice in 19 separate incidents because experimenters had failed to provide them with access to food and/or water. Four monkeys required emergency veterinary care for dehydration after they didn't have access to water for three days.

In one incident, a mouse was set on fire and had to be euthanized after experimenters failed to notice that alcohol fumes had built up during electrocautery surgery. More than 20 mice died after exposure to extreme heat between 90 and 100 degrees while trapped inside cages on separate occasions. Heat exposure in mice would likely have caused a systemic inflammatory response, which would have resulted in pain and distress as well as multiple organ failure. A mouse went unnoticed inside an enrichment tube of a cage and was scalded to death when the cage was run through a mechanical cage washer. In two separate incidents,

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several neonates were discovered in cages after they were sent to be run through a cage washer, and they were euthanized despite discovery.

Several experimenters deviated from institutional policies and veterinary directives. Failure to follow the policies and protocols that had been approved by the Animal Care and Use Committee (ACUC) suggests systemic problems in the institute's experimentation program, since the ACUC is intended to serve as the last line of defense for animals confined to NIH laboratories and used in experiments that may cause pain, discomfort, or distress and that almost always end in the animals' death. Eight mice died because an experimenter failed to follow protocol and monitor them after they had been injected with a cytotoxic chemotherapy drug, which may have prevented the rodents from being euthanized at the designated humane endpoint. In another case, 26 mice died or were euthanized after an experimenter didn't prepare and administer a hormone-therapy drug in the approved manner.

Eighteen of 50 African thicket rats had to be euthanized after employees gave them an unapproved overdose of an antibiotic and they developed adverse clinical signs. An overdose of this antibiotic would likely have caused an abnormally low heart rate and caused the rats' brains and other organs to become oxygen-deprived. This wasn't an isolated case, as five of 20 mice injected with an unapproved overdose of insulin died in a separate incident. In another case, a staff member not listed on the protocol injected an unapproved drug into seven mice, all of whom became ill—and one mouse had to be euthanized. Staff had also not been trained in either the safety issues or the required handling precautions related to the drug.

In separate incidents, 11 mice died after they were injected with compounds that are known to be highly toxic to mammals. The compounds weren't included in the approved proposal. A mouse was not given pain medication for five days, even though it was specified in veterinary directives. Repeated doses prescribed were also missed. Experimenters subjected a monkey to two survival surgeries under a protocol for which only a single surgery had been approved.

NIH experimenters repeatedly fail to follow approved euthanasia protocols in the agency's laboratories. Two post-baccalaureate fellows used unapproved euthanasia methods on mice. A juvenile mouse was found alive inside a refrigerator after experimenters failed to follow approved euthanasia protocols. A mouse died after a staff member failed to euthanize the animal within the period directed by the clinical veterinarian and the animal study proposal. In another incident, employees failed to follow protocol when they didn't use a required secondary, physical method of euthanasia after gassing four mice with isoflurane. Several unattended mouse cages were found in a carbon dioxide gas chamber while the gas flow was shut off. One of the mice was still alive.

As a federal agency, NIH is fully funded through tax dollars—receiving more than \$41 billion in FY2020. Its experimenters must be informed that failure to comply with minimum animal welfare laws and guidelines undermines crucial public faith in the agency and public trust in the system of oversight of NIH laboratories that use animals. There must be a zero-tolerance policy for experimenters who fail to comply with approved protocols and directives from veterinary staff—as well as a zero-tolerance policy for animal husbandry staff who fail to provide animals with basic necessities such as food, water, and safe shelter. Such problems will continue unless a

strong deterrent is implemented and a path is forged for moving forward that optimizes our nation's investment in biomedical research to cure disease, while eliminating ineffective experiments on animals.

Thank you for your time and consideration. I'd be happy to speak with you about this important matter at greater length. I can be reached at 541-848-7465 or AndreaK@peta.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrea Kuchy', with a long horizontal stroke extending to the right.

Andréa Kuchy, Ph.D.
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Laboratory Investigations Department