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CEO

Association for Assessment and Accreditation of Laboratory Animal Care
International
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Via e-mail: kbayne@aaalac.org

Dear Dr. Bayne:

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 request that the Association for the Assessment and Accreditation of Laboratory Animal Care International (AAALAC International) revoke its accreditation of Envigo. Gross negligence and widespread incompetence in one of Envigo's facilities have caused the animals there to endure immense pain, misery, suffering, and death. The attached inspection reports posted by the U.S. Department of Agriculture (USDA) indicate that Envigo has violated the federal Animal Welfare Act (AWA) and its implementing regulations, jeopardizing the safety of the vulnerable puppies, adult dogs, and other animals imprisoned there. **The incidents compiled below do not represent the “humane and responsible research animal care and use” that AAALAC accreditation ostensibly signifies, per its mission statement. Permitting facilities such as Envigo to disregard the minimal welfare standards for animals required by law diminishes the value of accreditation, and we therefore ask that you immediately revoke Envigo's accreditation.**

Envigo staff have failed to provide sick or injured animals with treatment or veterinary care and have failed to monitor them appropriately. Staff have failed to provide animals with the bare minimum of safe, appropriate, and sanitary housing or food. They have consistently failed to maintain medical records and animal acquisition and disposition records. In addition, the company has refused to be transparent, as required, as was demonstrated when it refused to allow Animal and Plant Health Inspection Service (APHIS) officials to perform a complete and thorough assessment of the facility's compliance with AWA regulations and to evaluate study records that describe the use of animals in experiments.

Because of these failures, countless animals have suffered and died or were otherwise neglected at the Envigo facility in Cumberland, Virginia, as described below:

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Failure to Provide Treatment or Veterinary Care

1. A beagle who had a severely infected “cherry” eye with a protruding membrane had not received any treatment or veterinary care.
2. More than four beagles with severe dental disease resulting in inflammation, bleeding gums, gingivitis, gum recession, and hair in the tartar had not received any dental cleanings or veterinary care.
3. A beagle with an infection in both of her ears, with scabs, inflammation, waxy debris, and discharge, had not received any treatment or veterinary care.
4. A beagle with a skin condition resulting in red and irritated skin, scabs, extensive hair loss, and a thinning coat had not been observed previously and had not received any treatment or veterinary care.
5. A beagle with hair loss and red, crusty skin at her tail base had not received any treatment or veterinary care.
6. A beagle with a 1-inch-long wound on the outer surface of her left ear, which had red discharge and hair loss, had not received any treatment or veterinary care.
7. A beagle puppy with lesions and scabs on the underside of all four toes of one foot, who was reluctant to bear weight on his foot, had not received any treatment or veterinary care.
8. A beagle with a toenail that had grown and curved against his toe pad, causing a depression, was reluctant to stand and bear weight on his left rear leg. His toe was swollen, the skin was red, and he had not received any treatment or veterinary care.
9. A beagle with a 1.5-inch-long brown scab filled with fluid, surrounding inflammation, and severe dental disease had not received any treatment or veterinary care.
10. A beagle with a 1-inch cyst between her toes, who was reluctant to bear weight on her leg, had not received any treatment or veterinary care.
11. A beagle with milky, yellow discharge in her eye and inflammation and crust surrounding her eye had not received any treatment or veterinary care.
12. A beagle with 80% hair loss on her body, redness of her skin, and small yellow scabs had not received any treatment or veterinary care.
13. More than 300 puppies were found dead; medical records attributed these deaths to unknown causes. Staff did not take any additional steps to determine the causes of death or to prevent similar deaths of other puppies in the future, and medical records were incomplete.
14. Sixteen dogs over 5 weeks old and 157 puppies under 5 weeks old were found dead. Postmortem decomposition was present, and no other causes of death had been identified. Medical records were incomplete; individual medical records had been maintained only for puppies over 5 weeks old while “litter records” had been maintained for those under 5 weeks old.

Incompatible Grouping

1. Seventy-one dogs had been injured and put down after a body part (such as an ear or a tail) was pulled through the wall of the kennel by a dog in an adjacent kennel and bitten.
2. Two female dogs on separate occasions were found dead from fight wounds. Forty-eight dogs (over 5 weeks old) had fight wounds during this same time period.

Failure to Meet Nutritional Needs

1. Seventy-eight 6-week-old beagle puppies were kept with their mothers while the latter were denied food for 42 hours. The puppies' only source of food was milk obtained by nursing, and their mothers were experiencing decreased milk production. The mothers stood and tried unsuccessfully to gain access to the food outside their cage. This situation resulted in malnutrition in the puppies, causing them to experience hunger, dehydration, stress, increased susceptibility to infections, and low blood sugar.
2. Food in self-feeders, silos/hoppers, and bulk feed containers in a food storage room was found to be heavily contaminated with a variety of live insects, including ants, black beetles, house and drain flies, and black, hairy worm-type insects. Self-feeders were the only source of food for the dogs.

Hazardous Housing Conditions

1. Hundreds of puppies and adult dogs were confined to rooms in which the temperature reached 92.3 degrees and exceeded 85 degrees for more than five hours continuously. There was no air conditioning or other mechanism in place for cooling the buildings. The dogs were panting and lethargic and were splayed out, avoiding contact with each other.
2. More than 200 puppies and their mothers were housed on raised plastic-coated metal grate-type flooring with openings that caused the puppies' feet to fall through the flooring up to their shoulders.
3. A 3-week-old puppy was found in the tray used for urine and feces collection and was in need of critical care. The puppy was huddled and cold, depressed, and contaminated with waste. The puppy had fallen into the tray during the morning cleaning.
4. An adult beagle was found with her front paw trapped in the grate flooring and was in need of critical care, panting rapidly and unable to free herself as the other three dogs in the kennel jumped around her excitedly. She was dehydrated, and her toes were swollen and red.
5. Sixty-two nursing female dogs and 393 puppies were deprived of adequate space.
6. "An overpowering ammonia and fecal odor" emanated from below the kennels, and brown organic material had accumulated on the walls of the dog runs.
7. Live spiders and spider webs, house and drain flies, water bugs, and cockroaches were extremely numerous both around and inside the entire facility, including in whelping rooms and kennels.

Inadequate Staffing

Staff had failed to identify 15 dogs with medical issues prior to a USDA inspection. Insufficient staffing has contributed to this failure. The facility purportedly employs 39 personnel for over 5,000 dogs, and there are five vacancies. Only one attending veterinarian is employed to oversee care for all the dogs and cats and assist in research projects.

Inaccurate/Incomplete Record Keeping

1. A puppy and two cage cards were missing from nursery cages.
2. Envigo failed to maintain complete and accurate medical records. Necropsy records and causes of death for numerous dogs were missing. Six dogs, including two who were put down, had fractures that were not recorded.

3. Envigo staff failed to follow approved protocols and record bodyweights of two dogs who were being fasted.
4. An Envigo principal investigator (PI) failed to provide scientific justification for the abrupt removal of food from and severe food restriction of lactating females and their puppies.
5. Multiple protocols using hundreds of puppies, adult dogs, and cats failed to include any descriptions of the proposed use of the animals and failed to provide a rationale for the appropriateness of the number stated, such as statistical calculations for statistically significant results, based on scientific literature or past experience, etc. Also completely missing were required details about invasive procedures, anesthesia, organ harvesting, injections and agents used, discussion of what was being studied or measured, etc.

The failure of Envigo to meet minimal animal welfare standards is contrary to AAALAC standards. We urge AAALAC to demonstrate its commitment to animal welfare by revoking the accreditation awarded to Envigo.

Thank you for your attention to this urgent matter. If you have any questions, please contact me at 541-848-7465 or AndreaK@peta.org.

Sincerely,



Andréa Kuchy, Ph.D.
Research Associate
Laboratory Investigations