



March 30, 2022

Radenka Maric, Ph.D.
Interim President
Office of the President
University of Connecticut

Via e-mail: maric@engr.uconn.edu; president@uconn.edu

Dear Dr. Maric:

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally. Based on the information presented below, we urge the University of Connecticut (UConn) to reimburse any and all federal and state funds used to acquire, breed, confine, and/or maintain the animals used in experiments whom UConn and/or Harvey Swadlow categorized as unnecessary, extraneous, noncritical, nonessential, ramped down, disposable, or nonpriority and/or described using similar terminology and—according to documents obtained by PETA through public records requests—euthanized in response to COVID-19.

Euthanizing Animals Deemed Extraneous in UConn Experiments Wastes Taxpayer Funds

Swadlow conducted and/or conducts the National Eye Institute (NEI)–funded project titled “Thalamortical Processing of Visual Information During Alert and Non-Alert Brain States” (NIH project numbers 1R01EY028905-01, 5R01EY028905-02, 5R01EY028905-03, and 5R01EY028905-04.), which has received \$1,195,425 from the NEI during FY2018 to FY2021.¹ Per its COVID-19 guidance, UConn notified its staff that “[l]abs and research programs should continue to have and refine plans to immediately halt or ramp down research activities, if required.”² A “Research Shut Down Notice” issued on March 23, 2020, directed research staff to “immediately reduce animal numbers and number of cages.”³ In addition, the “COVID-19 Research Ramp Down” letter issued by the Office of the Vice President for Research at UConn notified its staff that “[r]esearchers will begin immediately to ramp down research activities, including laboratory, animal, and non-therapeutic human subjects research.”⁴ As a result, rabbits assigned to Swadlow’s

¹NIH. RePORTER. Thalamortical processing of visual information during alert and non-alert brain states. <https://reporter.nih.gov/search/Fwk69-p90k-benm3o0z4QA/projects>

²UConn. COVID-19 Research Ramp Down. March 17, 2020. Accessed March 11, 2022. <https://ovpr.uconn.edu/2020/03/17/covid-19-research-ramp-down/>

³UConn. Research Shut Down Notice. March 22, 2020. Accessed March 10, 2022. [Research Shut Down Notice March 23, 2020 | Office of the Vice President for Research \(uconn.edu\)](https://ovpr.uconn.edu/2020/03/17/covid-19-research-ramp-down/)

⁴UConn. COVID-19 Research Ramp Down. March 17, 2020. Accessed March 10, 2022. <https://ovpr.uconn.edu/2020/03/17/covid-19-research-ramp-down/>

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protocol were euthanized in March 2020.⁵ This was verified in correspondence with UConn staff.⁶

The fact that laboratories led by UConn's employees had animals it deemed extraneous in the first place should raise significant red flags, especially since their experiments are funded by taxpayers who should not have to foot the bill for such waste.

UConn Protocols Apparently Failed to Reduce and Replace Animal Use

The presence of animals deemed unnecessary, nonessential, noncritical, or extraneous in UConn laboratories flies in the face of existing regulations designed to minimize the use of animals in experiments.

Language supported by the National Institutes of Health (NIH) requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the NIH Revitalization Act of 1993, the eighth edition of the *Guide for the Care and Use of Laboratory Animals*, and the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training:

- The Health Research Extension Act of 1985 states, “The Director of NIH shall require each applicant for a grant, contract, or cooperative agreement involving research on animals ... to include in its application or contract proposal ... (1) assurances satisfactory to the Director of NIH that ... (B) scientists, animal technicians, and other personnel involved with animal care, treatment, and use by the applicant have available to them instruction or training in the ... use of *research or testing methods that limit the use of animals* or limit animal distress”⁷ [*emphasis added*].
- The NIH Revitalization Act of 1993 states, “The Director of NIH ... shall prepare a plan ... for the National Institutes of Health to conduct or support research into ... *methods of such research and experimentation that reduce the number of animals used in such research*”⁸ [*emphasis added*].
- The eighth edition of the *Guide for the Care and Use of Laboratory Animals* states, “The *Guide* ... endorses the following principles: *consideration of alternatives (in vitro systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals*”⁹ [*emphasis added*].
- The U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training (1985) states, “The animals selected for a

⁵UConn Animal Services. Individual Animal Health Record. Updated 2013. Accessed March 11, 2022. https://www.peta.org/wp-content/uploads/2022/02/FOIA-20-264_Redacted.pdf

⁶University of Connecticut. Public Records Request. December 9, 2020. Accessed March 11, 2022. <https://www.peta.org/wp-content/uploads/2022/02/confirmation-from-UConn.pdf>

⁷Health Research Extension Act of 1985, Publ. L. No. 99-158. November 20, 1985. Accessed March 11, 2022. <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

⁸NIH Revitalization Act of 1993, Publ. L. No. 103-43. June 10, 1993. Accessed March 11, 2022. <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

⁹National Research Council. Committee for the Update of the *Guide for the Care and Use of Laboratory Animals*. *Guide for the Care and Use of Laboratory Animals*. 8th ed. The National Academies Press; 2011. Accessed March 11, 2022. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>

procedure should be of an appropriate species and quality and *the minimum number required to obtain valid results*”¹⁰ [*emphasis added*].

When UConn experimenters buy, breed, trap, and/or use animals who at any time—not just during the COVID-19 pandemic—can be deemed unnecessary, nonessential, noncritical, or extraneous or described using similar terminology, they squander limited research funds, much of which are provided by taxpayers, and flout the bedrock “3Rs” principle of reducing, replacing, and refining the use of animals in experimentation enshrined in government regulations and policies.

In addition, because taxpayer funds were used to acquire, breed, confine, and/or maintain these animals who were then so readily euthanized and disposed of in response to COVID-19, UConn should reimburse the funding agencies for this fiscal waste.

Furthermore, the Congressional Research Service found that during the COVID-19 pandemic, “Suspending research may result in additional costs for activities such as animal care” and “[r]estarting research, when conditions permit, may also incur costs for staff time and supplies to ... reestablish laboratory animal populations.”¹¹ Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations,” since UConn deemed them unnecessary, nonessential, noncritical, or extraneous to the experiments and because repopulating animals in laboratories at taxpayers’ expense would appear to violate federal regulations and policies that mandate minimizing the use of animals in experiments.

Request for Research Accountability and Modernization

We urge you to withdraw the referenced funds allocated to support this laboratory and reimburse state and federal agencies for any and all funds used to acquire, breed, confine, and/or maintain animals whom experimenters deemed unnecessary, nonessential, noncritical, or extraneous or described using similar terminology and then euthanized in response to the university’s modified operations for COVID-19. Moreover, instead of supporting wasteful experiments on animals that do not advance human health, we encourage UConn to shift its efforts to projects focused on human-relevant, non-animal research methods, as described in PETA’s Research Modernization Deal.¹²

You can contact me at ShriyaS@peta.org. Thank you for your consideration of this important issue. We look forward to your response.

Sincerely yours,

¹⁰National Research Council. Committee for the Update of the *Guide for the Care and Use of Laboratory Animals*. (2011). Appendix B: U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training. Accessed March 11, 2022.

<https://www.ncbi.nlm.nih.gov/books/NBK54048/>

¹¹Congressional Research Service. Effects of COVID-19 on the Federal Research and Development Enterprise. April 10, 2020. Accessed March 11, 2022.

<https://crsreports.congress.gov/product/pdf/R/R46309>

¹²People for the Ethical Treatment of Animals. The Research Modernization Deal 2021. Last updated October 2020. Accessed March 11, 2022. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>



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