



March 30, 2022

Rebecca M. Blank, Ph.D.
Chancellor
Office of the Chancellor
University of Wisconsin–Madison

Via e-mail: chancellor@news.wisc.edu

Dear Chancellor Blank:

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 Wisconsin–Madison to reimburse any and all National Institutes of Health (NIH) and state funds used to acquire, breed, confine, and/or maintain the animals used in experiments and whom UW-Madison and/or experimenter Laura Knoll 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 UW-Madison Experiments Wastes Taxpayer Funds

Knoll conducted and/or conducts the National Institute of Allergy and Infectious Diseases (NIAID)–funded project titled “Sexual Development of Toxoplasma in Feline Intestinal Organoids” (NIH project numbers 1R01AI144016-01, 5R01AI144016-02, 5R01AI144016-03, 5R01AI144016-04), which has received \$1,524,195 during FY2019 to FY2022.¹ According to documents PETA obtained through public records requests, an estimated two-thirds of a nearly 700-member colony of mice assigned² to Knoll's aforementioned protocol were deemed by UW-Madison and/or Knoll as nonessential and killed in response to the university's COVID-19 response plan,³ which states that “[a]ll on-site

¹National Institutes of Health. RePORTER. Sexual Development of Toxoplasma in Feline Intestinal Organoids. Accessed March 10, 2022.

<https://reporter.nih.gov/search/hZZvR14-7UWc8-IrJu7SFO/projects>

²Cima G. Research Delayed, Rodent Populations Reduced During Pandemic. American Veterinary Medical Association. Published April 29, 2020. Accessed March 10, 2022. <https://www.avma.org/javma-news/2020-05-15/research-delayed-rodent-populations-reduced-during-pandemic>.

³University of Wisconsin–Madison. Kaylie Flaughter People for the Ethical Treatment of Animals (PETA) Public Records Request :: P001886-092321. Accessed March 11,

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research activities must be approved by a dean or director, who are directed to only approve essential research, based on their judgement” and that “[r]esearchers should consider reduction or cessation of non-critical animal breeding, including agricultural animals and USDA-covered species.”⁴

The fact that laboratories led by UW-Madison’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.

UW-Madison Protocols Apparently Failed to Reduce and Replace Animal Use

The presence of animals deemed unnecessary, nonessential, noncritical, or extraneous in UW-Madison 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” [emphasis added].⁵
- 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*” [emphasis added].⁶
- 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*” [emphasis added].⁷

2022. <https://www.peta.org/wp-content/uploads/2022/01/uw-madison-responsive-records-response-letter.pdf>

⁴University of Wisconsin–Madison. Campus Research Activities Update. March 19, 2020. Accessed March 11, 2022. <https://news.wisc.edu/campus-research-activities-update/>

⁵Health 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>

⁶NIH 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>

⁷National 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.

- 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 procedure should be of an appropriate species and quality and *the minimum number required to obtain valid results*” [*emphasis added*].⁸

When UW-Madison 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, UW-Madison should reimburse the funding agencies for this fiscal waste.

Furthermore, the Congressional Research Service (CRS) has 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.”⁹ Taxpayers should not be responsible for the additional costs associated with “reestablishing laboratory animal populations” since UW-Madison deemed them to be unnecessary, nonessential, noncritical, or extraneous to the experiments and because repopulating animals in laboratories at taxpayers’ expense would appear to violate the aforementioned 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 to reimburse state and federal agencies with any and all funds used to acquire, breed, confine, and/or maintain the 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, which do not advance knowledge of human health, we encourage UW-Madison to shift its efforts to projects focused on

Accessed March 11, 2022. <https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>

⁸National Research Council, Committee for the Update of the *Guide for the Care and Use of Laboratory Animals*. Appendix B: U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training. *Guide for the Care and Use of Laboratory Animals*. 8th ed. The National Academies Press; 2011. Accessed March 11, 2022. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>

⁹Congressional 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>

human-relevant, non-animal research methods as described in PETA's Research Modernization Deal.¹⁰

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,

A handwritten signature in black ink, appearing to read 'Shriya Swaminathan', with a stylized flourish at the end.

Shriya Swaminathan
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¹⁰People for the Ethical Treatment of Animals. The Research Modernization Deal. Last updated October 2020. Accessed March 11, 2022. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>