March 8, 2022

Joan T.A. Gabel President University of Minnesota

Via e-mail: upres@umn.edu

Dear President Gabel:

I hope this correspondence finds you well. I am writing on behalf of People for the Ethical Treatment of Animals U.S.—PETA entities have more than 9 million members and supporters globally—to request that you take personal responsibility for addressing the chronic and egregious animal welfare violations that characterize the treatment of vulnerable animals in the University of Minnesota's (UMN) laboratories.

According to records obtained by PETA through the Freedom of Information Act, UMN reported 47 violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between January 2018 and September 2021. Among other serious documented issues, UMN experimenters failed to give adequate pain relief to nearly 700 pigs, hamsters, mice, and rats used in painful and invasive procedures.

Employees' negligence resulted in the starvation, dehydration, and deaths of numerous animals. For example, two dead mice were discovered after their cage was sent through the autoclave—a high-temperature cage steamer used for sterilization. Employees failed to provide mice in a cage with food for four days, and they were found lethargic, hunched, and in need of emergency supportive veterinary care. Four monkeys' water was severely restricted—against protocol.

Several experimenters deviated from approved protocols and conducted experiments or used animals not included in protocols that the university's Institutional Animal Care and Use Committee (IACUC) had approvedsuggesting systemic problems in the school's experimentation program. As you know, IACUCs serve as the last line of defense for animals held in laboratories and used in experiments that may cause pain, discomfort, and distress and that almost always end in their death-and serious deviations from IACUC-approved protocols are considered gravely problematic by the U.S. Department of Agriculture. Among these, experimenters performed unapproved cardiovascular surgery on rats and unapproved tail amputation procedures on 151 mice. Forty mice were subjected to multiple facial vein bleeding procedures that were not approved. Live zebrafish were used in a cryopreservation study in contravention of the protocol, which did not approve of using live animals. Two rats were perfused, and tissue was collected for an unapproved study. A monkey was subjected to two procedures separated by four days instead of seven days as stipulated in the protocol.

# PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

PETA

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Employees' negligence and lack of proper monitoring resulted in the entrapment and death of two weanling mice between a cage lid and wire following an eartagging procedure, resulting in one death. The other mouse became dehydrated. On two separate occasions, four monkeys became locked in one quadrant of a caging unit for up to 15 hours because employees did not remove and secure the cage dividers. Six male mice from different groups were inappropriately put together in a single cage, leading to serious fighting. They were euthanized because of the severity of their injuries.

Experimenters failed to follow approved euthanasia protocols in the school's laboratories and euthanize animals in a timely manner, resulting in exacerbated suffering. For example, a weanling mouse was discovered alive in a euthanasia bag following improper euthanasia. In another case, an experimenter began euthanizing a cage of adult and weanling mice but left the room and failed to return. A veterinarian discovered the animals in the CO2 euthanasia chamber the following day—they were still alive. After experimenters ignored a veterinary directive to euthanize a female guinea pig and her four pups, three pups were found dead, and the mother was found in a moribund state—likely with labored breathing, sunken eyes, and impaired mobility, resulting in an inability to reach food or water.

Such problems will continue unless UMN implements a strong deterrent. The university must inform principal investigators that if they violate federal animal welfare regulations or guidelines in connection with their laboratories, the IACUC will withdraw approval for the protocol and revoke the investigator's animal experimentation privileges, and violators will be permanently prohibited from accessing all animal laboratories.

In fiscal year 2021, UMN received more than \$336 million in taxpayer money from NIH. Funding agencies—and the public—expect that institutions will comply with minimal animal welfare regulations and guidelines with the provision of such funding. The university's failures represent an abject violation of the public's trust—and we ask that you make haste in addressing this serious matter and replace animal experiments with modern, human-relevant research methods.

I am available to discuss this issue with you and can be reached at 541-848-7465 or AndreaK@peta.org. Thank you for your time and consideration.

Sincerely,

Andréa Kuchy, Ph.D. Research Associate, Laboratory Investigations