



March 29, 2022

Paul Klotman, M.D.
President, CEO, and Executive Dean
Baylor College of Medicine
1 Baylor Plaza, Ste. 279A
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Via e-mail: president@bcm.edu

Dear President Klotman:

I'm 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 ask once again that you use your authority to stop the seemingly unending catalog of jarringly appalling violations of federal animal welfare laws in Baylor College of Medicine's (BCM) laboratories, which result in unchecked pain and suffering as well as agonizing deaths for animals.

My colleague Dr. Magnolia Martínez wrote to you in September 2019 asking that you intervene to end the chronic and egregious animal welfare violations in BCM's laboratories. However, it appears that no meaningful action has been taken and that the horror show continues unabated. I am writing to ask that you institute a policy whereby principal investigators who fail to comply with approved protocols and directives from veterinary staff and animal husbandry staff who fail to provide animals with necessities such as food, water, and safe shelter be prohibited from having any contact with animals—and that all their laboratory privileges be revoked permanently.

PETA has obtained federal reports from the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare, dated February 1, 2019, to June 10, 2021, that document 78 federal animal welfare violations in BCM's laboratories. Animals have endured pain and agony and died as a result of neglect, incompetence, and overt indifference.

Failure to Provide Animals With Adequate Pain Relief

Animals in BCM's laboratories have been used in invasive experimental surgeries, but no fewer than 18 reports document the experimenters' failure to provide animals with appropriate pain relief or postsurgical care—resulting in unchecked pain and agony for the animals involved. Here is a small sampling of the reported incidents:

- Experimenters subjected 69 rats to tracheal surgery but failed to provide them with a required secondary analgesic.
- Approximately 300 mice were subjected to tumor cell placement surgery but did not receive a required secondary analgesic.
- Experimenters failed to provide mice with postsurgical care—and one month after surgery, 24 mice still had wound clips that should have been removed much sooner.

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- Experimenters subjected mice to tumor removal surgery but failed to give them the presurgical analgesic described in the protocol or the postsurgical analgesics they were supposed to receive for three consecutive days after the surgery. The animals were also not monitored for three days following the surgery, and one mouse died.
- Four mice who were subjected to an invasive cardiac procedure did not receive analgesics for six days following the procedure.
- Twelve mice were castrated but were not given the full three-day regimen of analgesics as described in the protocol and were not adequately monitored. Two mice died, and two suffered from health impacts.
- The toes of 20 neonatal mice were amputated, but the animals did not receive anesthetics or analgesics.
- Seventy-eight mice underwent head-bar implantation surgery. They received analgesics every 24 hours postoperatively instead of every 12 hours as stipulated in the protocol.
- Thirty-five mice were subjected to tumor transplants. One mouse was found dead, and another was found moribund and was euthanized. The mice had received only one dose of postoperative pain relief, even though the protocol stipulated that pain relief should be provided for six days following the procedure.
- Fifteen mice were subjected to experimental surgery but received postsurgical pain relief for only two out of five days. The surgical incisions on three mice in this group had partially split open.
- Thirty-three mice were subjected to cranial injections but did not receive a secondary analgesic as stipulated by the protocol.

Deviations From Approved Protocols

Experimenters deviated from protocols that had been approved by BCM's Institutional Animal Care and Use Committee (IACUC). As you know, IACUCs are a cornerstone of animal use oversight. Deviations from IACUC-approved protocols represent a serious breakdown in the oversight system—exposing already vulnerable animals to additional pain and suffering. Here is a small sampling of such incidents:

- At BCM, experimenters amputated the ends of mice's tails, killed mice by breaking their necks, and amputated their toes without anesthetics or analgesics—all in breach of IACUC-approved protocols.
- In one study, experimenters injected mice in their foot pads, rather than under their skin as had been approved.
- Five pairs of mice who had been stitched together in a parabiosis experiment were subjected to risky and complicated parabiosis separation surgery that was not described in the IACUC-approved protocol.
- Mice who were subjected to cranial surgery received a different combination of analgesics than what was described in the protocol.
- Experimenters subjected 342 mice to procedures in which substances not described in the protocol were either injected into the animals or administered through gavage tubes thrust down their throats.
- Experimenters subjected 12 rats to mammary tumor removal surgery, even though this procedure was not described in the protocol. One rat died from unknown causes the day after the surgery.
- Nine mice were given injections of the chemical tamoxifen into their abdomens, even though this had not been described in the protocol. Four of them died.

- Blood was drawn from an artery behind a mouse's eye, and then her eye was removed—all without anesthetics. These procedures were not included in the protocol. The mouse died after the procedure and prior to the planned euthanasia.

Failure to Ensure That Medications Had Not Expired

Seven reports document experimenters' failure to ensure that anesthesia, analgesia, and euthanasia solutions had not expired—calling into question whether the medications used were safe or effective.

- In one study, experimenters subjected 76 mice to a laparotomy (an incision into the abdominal region) but gave them an expired analgesic.
- In another study, experimenters removed the ovaries of 50 mice and implanted a cannula (or tube) into their bodies—but again gave the animals an expired analgesic.
- A pig was killed with an expired euthanasia solution.
- Sixty mice were implanted with a cell capsule but were given an expired analgesic. In a different experiment, a pellet was implanted subcutaneously in eight mice, who were given an expired analgesic.
- Two hundred eighty-six mice were given an expired anesthetic before being subjected to a terminal perfusion—a procedure akin to embalming in humans, in which a chemical solution is plunged into an animal's vascular system to replace the blood.

Failure to Use Appropriate Surgical Methods

Six reports document experimenters' failure to use aseptic surgical methods or monitor animals following surgery, as required.

- An experimenter failed to maintain aseptic technique while performing surgery on mice.
- After subjecting mice to tumor removal surgery, experimenters failed to monitor them. One mouse was found dead in his cage.
- After subjecting mice to a cranial injection procedure, experimenters failed to monitor them as required by the protocol.
- A mouse was subjected to mammary fat pad injections and was scheduled to be euthanized the following day. However, the mouse remained in the cage for four days, indicating inadequate postoperative monitoring.
- During an inspection, it was observed that an anesthetized mouse had been placed in a stereotaxic restraining device for surgery but had been left unattended.
- After injecting a compound into the mammary glands of 12 anesthetized mice, an experimenter left the mice unattended, and one mouse died.

Failure to Provide Animals With Food or Water

Multiple reports document failure on the part of BCM employees to provide animals with food or water—resulting in extensive discomfort and distress to animals and, in some cases, death.

- In one study, workers failed to provide rats with water for two days.
- Six mice who were going to be euthanized were left without water in the euthanasia machine.
- A rack holding 70 mouse cages did not give the animals access to water. The rack had become disconnected from the water supply—but it was three days before the problem was identified.
- Seven cages, holding eight mice in total, were found without food or water.

- Experimenters subjected six mice to cranial electrode implants and instructed workers to place food on the floor of the animals' cages—but no food was given to them. Four of the mice were found dead—they were hunched and had ruffled fur.

Failure to Ensure That Personnel Are Competent or Properly Trained

Multiple reports document worker incompetence. Employees who had not been trained or approved to perform specific procedures on animals nonetheless carried out these procedures—jeopardizing the welfare of the animals involved.

- A piglet who was subjected to a surgery suffered from a 20-centimeter rupture of the small intestine through the abdominal incision due to inappropriate suture spacing.
- An experimenter who killed four mice was not approved to perform the procedure.
- An employee failed to use personal protective equipment while handling animals in a biohazard procedure room.
- An employee crammed eight mice into a cage and left them in this severely crowded enclosure overnight so that they could be killed the next day.
- Employees failed to monitor water quality parameters adequately, and as a result, 6,425 zebrafish died.
- Twenty mice had been placed in a chamber in which they would be forced to inhale smoke. During an inspection, an experimenter was observed shaking the chamber to separate and adjust the position of the mice in the container.
- A veterinary technician observed two postoperative mice with open wounds. Laboratory staff who had observed the mice earlier failed to communicate their condition to veterinary staff. The mice had not received appropriate pain relief as described in the approved protocol and aseptic surgery techniques had not been used.

In addition to the problems indicated above, experimenters used unapproved euthanasia methods—such as cervical dislocation without anesthetics—or failed to perform euthanasia in a timely manner. In one incident, a mouse had been injected with a compound in the lower part of his body and was then observed to be keeping weight off of one of his legs. Euthanasia was recommended for him, but the experimenter forgot about him, and the mouse was left unattended overnight—extending his suffering.

Last year, BCM received more than \$351 million in taxpayer money from NIH, and approximately half of this amount funded experiments on animals. Funding agencies—and the public—expect institutions to comply with minimal animal welfare regulations and guidelines with the provision of such funding. BCM's failures represent an abject violation of the public's trust—and we ask that you make haste in addressing this serious matter.

I would appreciate the courtesy of a prompt response. I can be reached at AlkaC@peta.org.

Sincerely,



Alka Chandna, Ph.D.
Vice President
Laboratory Investigations Cases