



June 14, 2022

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Via e-mail: [minister@ipc.gov.pk](mailto:minister@ipc.gov.pk)

Dear Mr. Mazari:

Thank you in advance for your time and consideration. 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 share some disturbing information about reported cruel and deadly surgical practices on dogs and other animals performed by students at Pir Mehr Ali Shah Arid Agriculture University Rawalpindi; Riphah College of Veterinary Sciences, Lahore; and COMSATS University, Lahore Campus.

**Based on the following information, we respectfully request that you investigate this matter and issue a circular requiring the use of superior and humane simulation models and prohibiting the use of animals in veterinary and zoology training involving procedures that are neither medically necessary for, nor of direct benefit to, the animals subjected to these practices.**

### **Shocking Reports of Cruel Veterinary Training in Pakistan**

Recent media reports include disturbing videos that appear to show crude, invasive procedures conducted for veterinary training in at least three institutions in Pakistan: Pir Mehr Ali Shah Arid Agriculture University Rawalpindi; Riphah College of Veterinary Sciences, Lahore; and COMSATS University, Lahore Campus. The videos show dogs and other animals with their mouths and legs tied, lying in pools of blood and excreta after being operated upon without anesthetic drugs, left cut open in filthy conditions and without post-operative

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care, and writhing and whimpering in pain.<sup>1,2,3,4,5,6,7,8,9,10</sup> The students reportedly kidnapped these dogs from the streets, and some have been seen laughing at the animals' suffering. These videos quickly spread on social media and sparked outrage among the public and from prominent figures including actors Yashma Gill and Mishu Khan.

### **Humane Veterinary Training Methods Are Widely Available**

Without a doubt, veterinary students need supervised hands-on experience with live animals as an important aspect of their clinical training and preparation. However, this training can be accomplished ethically *without harming* animals, and there is no need to keep animals on site in laboratory cages. Basic skills training—such as IV catheter placement, blood draws, intubation, restraint, radiographic positioning, and critical care monitoring—as well as advanced surgical training can be accomplished using realistic simulation models. Once students are comfortable with these skills, carefully supervised veterinary clinical practicums involving animals who present with a medically relevant issue and/or who would directly benefit from the procedures performed on them in the clinic allow veterinary trainees to put their knowledge to use. Importantly, procedures that are neither medically necessary for, nor of direct benefit to, the animals subjected to these practices should be prohibited during such trainings.

While technical skills are very important, it is also of the utmost importance to instill a culture of care in veterinary training. Creating a dichotomy between the animals used for training and the animal companions seen in an examination room does not benefit the veterinary profession. There are many humane training methods available that can effectively prepare veterinary students for a fruitful career. Here are just some examples:

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<sup>1</sup>Roger S. Graphic videos uncover secret animal dognappings and abuse at Pakistani university. *ProPakistani*. June 8, 2022. Accessed June 13, 2022. <https://propakistani.pk/2022/06/08/graphic-videos-uncover-secret-animal-dognapping-and-abuse-at-pakistani-university>.

<sup>2</sup>Web Desk. Yashma Gill calls out Pakistani universities for “unjust” animal experimentation. *Daily Pakistan*. June 6, 2022. Accessed June 13, 2022. <https://en.dailypakistan.com.pk/06-Jun-2022/yashma-gill-calls-out-pakistani-universities-for-unjust-animal-experimentation>.

<sup>3</sup>Rehman S. Rawalpindi university torturing stray animals to teach students, say activists. *Geo News*. June 8, 2022. Accessed June 13, 2022. <https://www.geo.tv/latest/421272-rawalpindi-university-torturing-stray-animals-to-teach-students-say-activists>.

<sup>4</sup>Roger S. Protestors call for end to unethical animal experiments at veterinary universities. *ProPakistani*. June 13, 2022. Accessed June 13, 2022. <https://propakistani.pk/2022/06/13/protestors-calls-for-end-to-unethical-animal-experiments-at-veterinary-universities/>.

<sup>5</sup>MM News Staff. Veterinary universities using stray dogs for teaching students. *MM News*. June 7, 2022. Accessed June 13, 2022. <https://mmnews.tv/veterinary-universities-using-stray-dogs-for-teaching-students/>.

<sup>6</sup>JFK Animal Rescue and Shelter. (Instagram post.) June 7, 2022. Accessed June 9, 2022. <https://www.instagram.com/p/CeggyzvOea>.

<sup>7</sup>Yashma Asad Gill. (Instagram post.) June 5, 2022. Accessed June 9, 2022. <https://www.instagram.com/p/Cebgh8mjeer>.

<sup>8</sup>Critters Ark Welfare Org. (Instagram post.) June 5, 2022. Accessed June 9, 2022. [https://www.instagram.com/tv/CebddjNjBYA/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/tv/CebddjNjBYA/?utm_source=ig_web_copy_link).

<sup>9</sup>Critters Ark Welfare Org. (Instagram post.) June 8, 2022. Accessed June 9, 2022. [https://www.instagram.com/tv/Cejfc3lDWZP/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/tv/Cejfc3lDWZP/?utm_source=ig_web_copy_link).

<sup>10</sup>ACF Animal Rescue Official. (Instagram post.) June 7, 2022. Accessed June 10, 2022. <https://www.instagram.com/p/Cefh7WzIzVJ>.

- The SynDaver Surgical Canine is suitable for replacing live animals and animal cadavers in veterinary surgical training. The model breathes and bleeds; has individual muscles, organs, and bones; and can be operated on repeatedly.<sup>11</sup>
- Critical Care Jerry and Critical Care Fluffy are complete emergency room veterinary training dog and cat manikins, respectively. They have the ability to simulate trauma, feature jugular and vascular access, and allow for the training of airway management, ventilation, endotracheal intubation, mouth-to-snout resuscitation, and circulation with external chest compressions.<sup>12,13</sup>
- Virtual Animal Anatomy is an innovative online anatomy software program that includes virtual anatomical models of dogs, cats, cattle, and horses. Virtual Canine Anatomy, the dog model, has received outstanding accolades from members of the American Association of Veterinary Anatomists, students, and instructors both in the U.S. and internationally. The program allows the luxury of self-paced, individualized learning and offers a focal point around which the instructor and student can exchange ideas and make interpretations of course content.<sup>14</sup>
- Biosphera offers interactive software models that let students explore human and animal anatomy through virtual dissections. It currently has 12 model options, including dogs, cats, horses, rats, pigs, and cattle, designed especially for students, teachers, and professionals in the life sciences and veterinary medicine.<sup>15</sup>

### **Global Shift to Replace the Use of Animals in Experiments for Human Health**

On September 16, 2021, in a monumental move for scientific research motivated largely by the scientific failings of the use of animals in testing, the European Parliament passed a resolution calling on the European Commission to create an action plan to end all experiments on animals.<sup>16</sup> The resolution, proposed by members of Parliament (MEPs) who reviewed PETA's Research Modernization Deal,<sup>17</sup> calls for accelerating scientific innovation without the use of animals in research, regulatory testing, or education.<sup>18</sup> The MEPs have directed the European Commission to work with scientists, including those from animal protection organizations, to accomplish this.

The National Hispanic Medical Association (NHMA), representing the interests of 50,000 licensed Hispanic physicians in the U.S., establishes in a position statement that it “does not conduct, fund,

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<sup>11</sup>SynDaver. Canine Surgical Model. SynDaver. Accessed June 13, 2022.

<https://syndaver.com/product/canine-surgical-model>.

<sup>12</sup>Rescue Critters. Critical Care Jerry. A Thales & Co. Accessed June 13, 2022.

<https://rescuecritters.com/product/critical-care-jerry>.

<sup>13</sup>Rescue Critters. Critical Care Fluffy. A Thales & Co. Accessed June 13, 2022.

<https://rescuecritters.com/product/critical-care-fluffy>.

<sup>14</sup>Virtual Animal Anatomy. Virtual Animal Anatomy. Colorado State University. Accessed June 13, 2022. <https://virtualanimalanatomy.colostate.edu>.

<sup>15</sup>Biosphera. Biosphera. Published November 13, 2020. Accessed June 13, 2022.

<https://biosphera3d.com>.

<sup>16</sup>European Parliament. MEPs demand EU action plan to end the use of animals in research and testing. European Parliament. September 16, 2021. Accessed June 13, 2022.

<https://www.europarl.europa.eu/news/en/press-room/20210910IPR11926/meps-demand-eu-action-plan-to-end-the-use-of-animals-in-research-and-testing>.

<sup>17</sup>PETA. The Research Modernization Deal 2021. PETA.org. Updated October 2020. Accessed June 13, 2022. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>.

<sup>18</sup>European Parliament. Plans and actions to accelerate a transition to innovation without the use of animals in research, regulatory testing and education. European Parliament. Updated September 16, 2021. Accessed June 13, 2022.

[https://www.europarl.europa.eu/doceo/document/TA-9-2021-0387\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-9-2021-0387_EN.html).

commission, or support tests on animals” and that it “strongly supports PETA’s ‘Research Modernization Deal’.” The NHMA goes on to note that “[a]nimals used in laboratory experiments are biologically, physiologically, and anatomically different from human beings, making animal testing a suboptimal and highly error-prone endeavor that costs billions of taxpayer dollars each year . . . . Everyone will benefit from replacing animal experiments with more effective human-based medical research, and PETA’s plan provides a guide for how to achieve this important transition.”<sup>19</sup>

The National Medical Association (NMA), the oldest and largest national organization for African American physicians, also “does not conduct, fund, or commission tests on animals,” and the NMA “strongly supports the vision and plan articulated in PETA’s ‘Research Modernization Deal’ that offers a step-wise guide to eliminate misguided experiments on animals and instead prioritize more effective, ethical and economical non-animal research methods that will better advance human medical research for all.”<sup>20</sup>

Prominent medical organizations around the world such as the U.S. Accreditation Council for Graduate Medical Education (ACGME), the American Medical Student Association (AMSA), and the Indian National Medical Commission, formerly the Medical Council of India (MCI), among others, have publicly stated that schools can and should replace their use of animals with non-animal methods. The ACGME—the organization that sets medical curriculum standards and accredits medical schools in the U.S.—has written to PETA that it “supports the use of simulators and other non-animal training methods to replace the use of animals in the laboratory.”<sup>21</sup> AMSA—the oldest and largest independent association of physicians-in-training in the U.S.—passed a formal resolution in 2007, stating, “AMSA strongly encourages the replacement of animal laboratories with non-animal alternatives in undergraduate medical education.”<sup>22</sup> Further, a national regulatory change in 2014 by MCI at PETA India’s request now legally requires all medical schools in India to stop using animals in their undergraduate curricula.<sup>23</sup>

### **Pakistan’s Global Animal Protection Rating Needs Improvement**

The latest World Animal Protection ranking for Pakistan in the Animal Protection Index is E (on a scale of A to G, of which A is the best), and the portion regarding laws that apply to animals used for experiments is G, the worst ranking that a country can receive.<sup>24</sup> The Prevention of Cruelty to Animals Act (1890) does not include the principles of the 3Rs—replacement, reduction, and refinement—that are globally recognized and practiced in the field of science with respect to the use of animals in teaching and experimentation. In Pakistan, unlike many other countries in the world, there are no ethics committees overseeing the use of animals in teaching exercises and laboratory testing. Therefore, individual governing entities have more responsibility to prevent cruelty to animals. As the Federal Minister of the Ministry of Inter-Provincial Coordination, you have the responsibility to

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<sup>19</sup>NHMA. NHMA policy statements. NHMA. Updated May 10, 2022. Accessed June 13, 2022.

<https://www.nhmamd.org/nhma-policy-statements>.

<sup>20</sup>NMA. NMA statement on animal testing. NMAnet.org. Updated April 5, 2022. Accessed June 13, 2022. <https://www.nmanet.org/news/604379/NMA-Statement-on-Animal-Testing.htm>.

<sup>21</sup>ACGME. Letter to PETA. August 10, 2006.

<sup>22</sup>AMSA. Preamble, Purposes and Principles. [amsa.org](http://amsa.org). 2017. Accessed June 13, 2022.

<https://www.amsa.org/wp-content/uploads/2017/07/2017-PPP.pdf>.

<sup>23</sup>Medical Council of India. No.MCI-34(41)/2013-Med./64020. *The Gazette of India*. March 18, 2014. Accessed June 13, 2022. <http://www.petaindia.com/wp-content/uploads/2014/05/Medical-Council-of-India-guidelines-2014.pdf>.

<sup>24</sup>World Animal Protection. Animal Protection Index (API) 2020 Pakistan: Ranking E. October 3, 2020. Accessed June 13, 2022. <https://api.worldanimalprotection.org/country/pakistan>.

ensure that studies and trainings on animals conducted at the aforementioned institutions follow international best practices. As explained above, there is no justification for using animals in veterinary and zoology training involving procedures that are neither medically necessary for, nor of direct benefit to, the animals undergoing these practices.

**Request for Action to Stop Cruelty to Animals During Veterinary Training in Pakistan**

Mutilating and killing animals for veterinary and/or zoology teaching is unethical, and we ask that you please issue a circular requiring relevant veterinary and zoology training programs to switch to humane teaching methods such as those described above and prevent cruelty to animals from occurring again.

PETA has an international team of scientists who are ready to help you modernize science teaching. We successfully collaborated with the College of Physicians and Surgeons Pakistan to replace their use of animals for Advanced Trauma Life Support training, and we would be happy to do the same in this present case.<sup>25</sup> May I please hear from you by July 5, 2022, regarding this important matter? You can contact me at [SamuelP@peta.org](mailto:SamuelP@peta.org).

Sincerely yours,



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<sup>25</sup>PETA. PETA donates TraumaMan surgical simulators, saving countless animals' lives. PETA. Updated November 4, 2021. Accessed June 13, 2022. <https://www.peta.org/blog/peta-donates-more-traumaman-surgical-simulators>.