



August 8, 2022

Betty J. Goldentyer, D.V.M.
Deputy Administrator
USDA-APHIS-Animal Care
4700 River Rd
Riverdale, MD 20737

Via e-mail: Betty.J.Goldentyer@USDA.gov

Dear Dr. Goldentyer:

I am writing on behalf of People for the Ethical Treatment of Animals and our more than 9.5 million members and supporters to request that the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) investigate welfare concerns related to the treatment of dogs in a canine muscular dystrophy (MD) laboratory at Texas A&M University (TAMU; USDA Certificate No. 74-R-0012). We have written to you previously—on October 8, 2019, November 12, 2019, and October 13, 2021—regarding the laboratory's selective breeding of golden retrievers and other dogs to have painful and crippling canine MD. The condition ravages the dogs' bodies, causing progressive muscle wasting and weakness. The dogs have difficulty walking, eating, and even swallowing. While the university made the commendable decision in September 2019 to end its breeding program, the dogs from the MD colony who remain at TAMU continue to deteriorate. PETA has obtained daily observation and medical care records for the dogs from the canine MD laboratory, and it appears to us that dogs are being permitted to languish and even die in their kennels, in violation of the federal Animal Welfare Act (AWA) and the Animal Welfare Regulations (AWRs).

- On October 8, 2019, my colleague Dr. Emily Trunnell submitted a complaint to your office pertaining to a dog named Lunes who was afflicted with canine MD. Lunes was born on April 24, 2013 and by the time he was five years old, he was frequently leaving half, three-quarters, or all of his food. There were no notations in Lunes' records indicating that his poor appetite was being investigated or treated. Instead, TAMU permitted the dog to languish, and on June 4, 2019, he was found dead in the kennel in which he was held.
- On November 12, 2019, I submitted a complaint to your office pertaining to a dog named Pee Wee who was also afflicted with canine MD. Pee Wee was born on May 24, 2010; and by the time he was eight, his appetite had waned significantly. Numerous notations that span *years* indicated that Pee Wee was leaving some or all of his food.
- On October 13, 2021, I submitted an addendum to my earlier complaint, raising concerns regarding six additional dogs afflicted with canine MD—Bruno, Ganondorf, Jumba, Ned, Garen, and Grinch—who endured protracted suffering before finally being euthanized or dying in their kennels.

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PETA recently obtained additional records from TAMU, which indicated that **after we submitted our complaint to your office, Pee Wee continued to suffer in the university's laboratory.** By the time he was 11, Pee Wee had significant difficulty standing or walking. He had lost even more muscle mass, including in his jaw area and thighs and he suffered from an abnormal heart rhythm. The records indicate that Pee Wee was unable to stand on February 14, 15, and 16. He needed the help of standing aids to get him off the cage floor and leg braces during the infrequent times he was allowed to exercise.

On March 13 and 21, records indicate that staff observed that Pee Wee was “quiet.” He refused meals for days on end and lost 6 percent of his body weight in just 11 days. By March 21, he refused all treats, had to be helped to rise, and was slow to move. There was vomit in his cage. He stood for one minute and laid down again. All of this should have compelled TAMU's experimenters to finally release Pee Wee from his suffering; instead, Pee Wee was found dead in his kennel on the morning of March 26.

Section 2.31(d)(1)(v) states: “Animals [who] would otherwise experience severe or chronic pain or distress that cannot be relieved will be painlessly euthanized at the end of the procedure or, if appropriate, during the procedure.” The records PETA received from TAMU suggest that Pee Wee experienced chronic pain and distress for *years*, but even at the very end, TAMU failed to euthanize him. We believe this failure is a violation of Section 2.31(d)(1)(v).

Shortly after receiving records from TAMU indicating that Pee Wee had died alone in his kennel, PETA received documents from the USDA pertaining to PETA's complaints regarding the mistreatment of dogs in TAMU's canine MD laboratory. It appears from these records that the agency waited until November 29, 2021 to send an inspector to the university—and that inspector declined to take any action.

It's too late for Pee Wee—and Lunes, Bruno, Ganondorf, Jumba, Ned, Garen, Grinch, and so many others. But several dogs afflicted with canine MD are still in TAMU's laboratory; and even dogs who were born healthy are exhibiting debility from their years of imprisonment in TAMU's laboratory. For example, a dog named Elvira was born healthy into the canine MD laboratory on October 27, 2016. She was transferred to TAMU's veterinary school laboratory on November 3, 2020, where she's used in classroom exercises. On October 16, 2021, Elvira was observed to be unable to use her hind limbs. She's received steroid shots and other treatments, but her suffering continues.

We urge you to investigate the circumstances around Pee Wee's death, and also investigate the welfare of dogs from TAMU's canine MD laboratory who are still held in the university's laboratories.

Thank you for your time and consideration.

Sincerely,



Alka Chandna, Ph.D.
Vice President
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