September 29, 2022

Michael H. Schill, J.D. President Northwestern University

Via e-mail: nu-president@northwestern.edu

Dear President Schill:

Congratulations on your recent appointment as the 17th president of Northwestern University. 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 request that you take personal responsibility for addressing the chronic and egregious animal welfare violations that characterize the treatment of vulnerable animals in Northwestern's laboratories.

In our <u>March 31, 2020, correspondence to former president Morton Schapiro</u>, we shared serious concerns about weak oversight in Northwestern's animal experimentation program. We cited documentation that animals were used in painful, invasive procedures in unsterile conditions or denied appropriate pain relief. We urged the university to take action to address its alarming culture of disregard for basic animal welfare, but the problems persist and animals continue to suffer there. Since our most recent correspondence, according to records obtained by PETA U.S. through the Freedom of Information Act, Northwestern reported 14 violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between December 2020 and December 2021.

These records reveal that several experimenters deviated from approved protocols and conducted experiments with or otherwise used animals not included in protocols that the Institutional Animal Care and Use Committee (IACUC) had approved—suggesting systemic problems in the school's experimentation program. Some experimenters were not even trained or approved to perform procedures on animals. In one incident, an inadequately trained experimenter unsuccessfully attempted to perform cervical dislocation euthanasia—in which the experimenter attempts to break the cervical vertebrae away from the skull by manually pulling the animal's head and hind region in two opposing directions—on two mice. On another occasion, experimenters performed unapproved cervical dislocation euthanasia on nine mice. Unsuccessful euthanasia via cervical dislocation is inhumane, and mice may continue to breathe and feel pain after it's attempted.

Among other serious documented issues, on two separate occasions experimenters performed tail biopsies—amputation of a portion of the tail—on seven mice over 24 days old without any required anesthetics or pain relief. The mice likely experienced immense stress and pain, because the distal tail is completely ossified and innervated by 21 days of age



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Experimenters gave 11 mice an unapproved drug that leaked into the bedding from the water bottle, and the mice were euthanized. In another incident, 10 mice endured unapproved cell injection procedures and were euthanized. Eight mice were subjected to unapproved induction of autoimmune encephalitis in which the body's immune system attacks the brain and spinal cord, causing inflammation—and were euthanized. On at least two occasions, 16 of 28 mice subjected to surgery following improperly performed fur removal developed skin lesions and were euthanized or found dead. One of these studies was not even approved.

Experimenters subjected 33 mice to unapproved procedures in which they fed the animals a high-fat diet for three months and collected their blood. Thirteen of the mice were subsequently euthanized. On another occasion, experimenters subjected 36 mice to unapproved behavior experiments.

Employees' negligence has resulted in suffering and death for numerous animals at Northwestern. For example, nine mice drowned when a laboratory worker improperly docked a cage, allowing water to leak into the two cages below. We can only imagine how terrified these animals were as they swam desperately for their lives, frantically—and to no avail—looking for an escape as the cage slowly flooded. On two occasions, 15 mice in a hypoxia chamber died when experimenters failed to notice that the oxygen sensor had failed. Mice have been found to experience lethargy, reduced spontaneous movement, rapid breathing, and seizures before suffocating to death due to oxygen deprivation.

In fiscal year 2021, Northwestern received over \$48 million in taxpayer funds from NIH. Funding agencies—and the public—expect that institutions will comply with minimum animal welfare regulations and guidelines with the provision of such funding. The university's failures are an abject violation of the public's trust.

Northwestern's negligence and disregard for basic animal welfare must not continue. Such problems will persist unless strong deterrents are implemented. 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, revoke the investigator's animal experimentation privileges, and permanently prohibit their access to all animal laboratories. We ask that you address this serious matter immediately and implement PETA scientists' <u>Research Modernization Deal</u>—a strategy for replacing animal experiments with modern, human-relevant, animal-free research methods.

I am available to discuss these issues with you and can be reached at 541-848-7465 or <u>AndreaK@peta.org</u>. Thank you for your time and consideration of this important matter.

Sincerely,

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