



September 26, 2022

Dr. Elizabeth Goldentyer, D.V.M.
Deputy Administrator
APHIS Animal Care

Via email: betty.j.goldentyer@usda.gov

Dear Dr. Goldentyer:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to ask that the Animal and Plant Health Inspection Service (APHIS) request a formal investigation by Investigative and Enforcement Services (IES) for violations of the Animal Welfare Act (AWA) at Bethyl Laboratories (ID 1414, Certificate 74-R-0044).

Bethyl Laboratories was cited in 2021 for direct and repeat violations of the AWA and implementing regulations that severely affect the health and welfare of the animals and demonstrate a culture of negligence. In August 2021, the USDA cited the facility for having no written Program of Veterinary Care as required since they no longer had a full-time veterinarian, despite having more than 2,000 animals at the time. Other citations were issued for 1) a rabbit with ulcerated, open wounds on her feet who was not receiving any treatment for the injuries and a veterinarian had not been notified, and 2) an ammonia odor in the barn holding 360 rabbits that was so strong that it caused the inspectors' eyes to burn.

APHIS issued an Official Warning on October 14, 2021. Its accompanying letter states "...we have decided to not pursue penalties in this instance so long as you comply, in the future, with the AWA and regulations..."

However, Bethyl Laboratories continued to fail to comply with the AWA, and was cited for direct and repeat violations in a December 7, 2021 Inspection Report. Again, a rabbit was suffering from an "actively bleeding" lump on their foot, which also had old scarring and hair thinning. The caretaker failed to notice this injury. Another rabbit was squinting and had swelling, redness, and crustiness around their eye, as well as a "buildup of green discharge and mucous." The rabbit had apparently suffered with this eye problem for more than a month, yet a veterinarian was never notified.

We ask that you send this case to IES to conduct an investigation.

Thank you for your attention to this matter.

Sincerely,

Katherine Groff, M.S.
Senior Scientist
Regulatory Toxicology Department
KatherineG@peta.org
937-475-3884

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington, D.C.

1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles

2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk

501 Front St.
Norfolk, VA 23510
757-622-PETA

Oakland

554 Grand Ave.
Oakland, CA 94610
510-763-PETA

Info@peta.org
PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)