



November 17, 2022

Christina H. Paxson, Ph.D.
President
Brown University

Via e-mail: president@brown.edu

Dear President Paxson:

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 Brown's laboratories.

In our [July 6, 2021](#), correspondence, we shared serious concerns about failing oversight in Brown's animal experimentation program. We cited documentation that animals were used in unapproved procedures and then killed as well as that animals died from starvation and dehydration. We urged the university to take action to address the alarming culture of disregard for basic animal welfare in its laboratories. Still, the problems persist, and animals continue to suffer there. According to records obtained by PETA U.S. through the Freedom of Information Act, Brown reported 11 violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between July 2021 and May 2022.

These records reveal that several experimenters deviated from protocols that the Institutional Animal Care and Use Committee (IACUC) had approved, suggesting systemic problems in the school's experimentation program. Employees' negligence has resulted in suffering and death for numerous animals at Brown. On five separate occasions, animals died or were euthanized due to starvation or dehydration when they had no access to food or water. In one of these incidents, a mouse and all her pups were found dead in a cage after employees failed to ensure that they had food or water. In another incident, a mouse died after a worker failed to notice that his tail had become trapped in a cage lid while he was being moved to a different cage and that he couldn't access water.

An experimenter gave an unapproved overdose of hydrochloric acid to mice; six of the mice were euthanized as a result, and one mouse was found dead the next day. The experimenter violated protocol and caused animals to suffer beyond the established humane endpoints at which euthanasia is indicated due to pain or distress and didn't alert the veterinary staff or other lab members of the fatalities. This was a repeat violation in this laboratory—the same experimenter was responsible for a similar negative outcome on at least one prior occasion, and the IACUC

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determined that lab members had administered incorrect drug dosages to animals for several months.

In another incident, a rat died after an experimenter administered the wrong dose of an opioid drug to the animal during surgery. The lab manager failed to report the fatality, and it was only discovered in a records review during a semiannual inspection. Two rats died while under anesthesia on separate occasions, but the cause was never determined. In yet another incident, two rats awoke while experimenters were closing their skin at the surgery site.

An experimenter administered an expired euthanasia solution to animals twice in two years. In another incident, a rat was left unattended during surgery—an experimenter walked away in the middle of surgery after giving expired drugs to the rat, who was found alone and then monitored by a Center for Animal Resources and Education veterinarian until the experimenter returned 10 minutes later. Staff in another laboratory failed to record monitoring data during surgery on animals per protocol.

Experimenters in the school's labs failed to monitor animals or provide safe housing as required by the protocol. In one incident, a mouse sustained a leg injury and was euthanized after a cord became wrapped around part of the cage and the cage became dislodged. A bat died after his wing became trapped in the exterior bars of the enclosure; he wasn't found until the morning. In separate incidents, experimenters failed to consistently monitor mice and two turkeys after surgery as set forth by the approved protocol.

In fiscal year 2021, Brown received over \$140 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.

Brown's negligence and disregard for basic animal welfare must not be allowed to continue. Such problems will persist unless strong deterrents are implemented. The university should 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 investigators' 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' [Research Modernization Deal](#)—a strategy for replacing animal experiments with modern, human-relevant, animal-free research methods.

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

Sincerely,



Andréa Kuchy, Ph.D.
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