



November 1, 2022

Robert M. Gibbens, D.V.M.
Director, Animal Welfare Operations
USDA/APHIS/Animal Care

Via e-mail: Robert.M.Gibbens@usda.gov

Dear Dr. Gibbens:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our millions of members and supporters globally to request that the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) investigate possible violations of the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWR) related to the use and treatment of animals at Columbia University (Columbia; USDA Certificate No. 21-R-0082).

According to records PETA obtained through the Freedom of Information Act, Columbia reported violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW) from 2017 to 2022. It appears to us that **six** of these reported incidents, listed below, also represent violations of the AWRs. We believe that the treatment of the nonhuman primates and guinea pigs at Columbia described in the incidents detailed below is out of compliance with the veterinary care standards of the AWRs.

Incident Involving Incomplete Animal Medical Records of a Nonhuman Primate

[In a March 21 letter to OLAW](#), Columbia reported that medical records associated with a skin lesion on a nonhuman primate had been determined to be sparse, even though the veterinarian responsible for them had previously been counseled regarding medical record-keeping. The investigative team (veterinarian and pediatric anesthesiologist) determined that the communication skills of the veterinarian responsible for the records of concern were sometimes ineffective and that the veterinarian was sometimes not open to the suggestions and ideas of others.

Section 2.35(b)(3) of the AWRs states:

Attending veterinarian and adequate veterinary care. Each research facility shall establish and maintain programs of adequate veterinary care that include: ... (3) Daily observation of all animals to assess their health and well-being; ... *Provided, further,* That a mechanism of direct and frequent communication is required so that timely and accurate information on problems of animal health, behavior, and well-being is conveyed to the attending veterinarian.

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However, the school failed to maintain a mechanism of effective communication, as required by Section 2.33(b)(3).

Incidents Involving Unapproved Water Deprivation of Nonhuman Primates

[In an August 27, 2019, letter to OLAW](#), the university reported that a nonhuman primate hadn't been given water for three days. There was also a reported lack of proper documentation related to the provision of water. Reporting a separate incident, the university informed OLAW [in a letter dated December 6, 2019](#), that experimenters restricted drinking water for two nonhuman primates for 40 days, even though they weren't actively being studied at that time.

Section 3.83 of the AWRs states:

Watering. Potable water must be provided in sufficient quantity to every nonhuman primate housed at the facility. If potable water is not continually available to the nonhuman primates, it must be offered to them as often as necessary to ensure their health and well-being, but no less than twice daily for at least 1 hour each time, unless required by the attending veterinarian, or as required by the research proposal approved by the Committee at research facilities.

Through its neglect, Columbia failed to provide water to nonhuman primates, as required by Section 2.83.

Incident Involving Unapproved Viral Injection to a Guinea Pig

[In a March 27, 2019, letter to OLAW](#), the university reported that a guinea pig had been dosed with an unapproved strain of a virus.

Section 2.33(b)(2) of the AWRs states:

Attending veterinarian and adequate veterinary care. Each research facility shall establish and maintain programs of adequate veterinary care that include: ... (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries.

However, the school failed to give the approved drug to a guinea pig, as required by Section 2.33(b)(2).

Incident Involving Falsification of Animal Health Records for a Nonhuman Primate

[In a July 9, 2019, letter to OLAW](#), the university reported that an experimenter had falsified records. The experimenter responsible for administering drugs to a nonhuman primate who underwent total body irradiation, which causes suppression of the body's immune system, checked off boxes in the animal health records indicating that drugs had been administered to the animal. However, the person then neglected to monitor the animal or give drugs to the animal over two weekends.

Section 2.32(a) of the AWRs states:

Personnel qualifications. It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties.

However, the school failed to ensure that the experimenter was qualified to perform assigned duties, as required by Section 2.32(a).

Incident Involving Unapproved Surgical Procedures on a Nonhuman Primate

[In a March 27, 2019, letter to OLAW](#), the university reported that unapproved surgical procedures (oophorectomies) had been performed on a baboon.

Section 2.33(b)(2) of the AWRs states:

Attending veterinarian and adequate veterinary care. Each research facility shall establish and maintain programs of adequate veterinary care that include: ... (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries.

However, the school failed to provide the approved methods to prevent and control injuries to a nonhuman primate, as required by Section 2.33(b)(2).

[Columbia has also failed to comply with additional federal animal welfare guidelines.](#) While these incidents do not fall under the USDA's purview, they offer further evidence of the problems in the school's laboratories. Seven mice died and 23 others were euthanized after it was discovered that they had been subjected to unapproved fecal transplant surgeries. Among other serious documented issues, mouse pups were killed by an unapproved hypothermia method of euthanasia, and another mouse drowned in a behavioral testing pool in which the water was much colder than the protocol approved. The experimenter then left the dead mouse in the pool.

More than 122 adult mice and their pups died from dehydration. Some were cannibalized because experimenters had failed to provide access to water. Experimenters also failed to monitor the animals or recognize signs of distress and dehydration. Mice in four cages were found without food, water, or bedding, and experimenters subjected mice to unapproved procedures. In another incident, mice in as many as 30 moldy cages were housed in severely crowded conditions in an unapproved location for days with scarce food and water. Reports state that an undetermined number of mice were affected or died.

Some experimenters weren't even trained or approved to perform procedures on animals. For example, daily health checks weren't performed on frogs and the laboratory member wasn't formally trained or listed in the protocol. In separate incidents, experimenters used poor aseptic techniques while subjecting mice to surgical procedures, used unapproved drugs or failed to administer analgesia postoperatively, or conducted activity in unapproved locations. In other incidents, laboratories had ongoing issues with severely crowding mice, despite experimenters receiving counseling on permissible mouse housing density.

The institution's negligence and culture of disregard for basic animal welfare must not be allowed to continue. We urge you to investigate the alarming failures at this facility and take swift and decisive action that includes citing Columbia for violating the AWA.

Thank you for your consideration of this important issue. You can contact me at AndreaK@peta.org or 541-848-7465.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Kuchy', with a long horizontal stroke extending to the right.

Andr a Kuchy, Ph.D.
Research Associate
Laboratory Investigations Department