



January 23, 2023

Paul Klotman, M.D.
President, CEO, and Executive Dean
Baylor College of Medicine

Via e-mail: president@bcm.edu

Dear President Klotman:

I'm writing on behalf of People for the Ethical Treatment of Animals—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 Baylor College of Medicine's (BCM) laboratories.

In our letters from [March 2022](#) and [September 2019](#), we shared serious concerns about problematic oversight in BCM's animal experimentation program. We cited documentation that experimenters had failed to provide animals used in invasive surgeries with adequate pain relief, deviated from protocols that had been approved by BCM's Institutional Animal Care and Use Committee (IACUC), used expired medications, failed to use appropriate surgical and euthanasia methods, and failed to provide animals with food or water, in some cases leading to fatal results. We also urged the university to address the alarming culture of disregard for basic animal welfare in its laboratories. Still, the **problems persist, and animals continue to suffer in BCM's laboratories**. According to records obtained by PETA through the Freedom of Information Act, **BCM reported 14 more violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between January and August 2022, affecting more than 215 animals.**

These records reveal that several experimenters failed to follow the experimental methods outlined in the IACUC-approved protocol, suggesting systemic problems in the school's experimentation program. Employees' negligence has resulted in suffering and death for numerous animals at BCM. In one incident, a mouse was severely burned by flames while being operated on—a fire ignited under the surgical drape by the electrocautery tool being used for the procedure. The mouse had to be euthanized due to the severity of the burns. In another incident, two mice locked inside a cage were scalded to death after they were run through a mechanical, high-temperature cage washer. Extended exposure to temperatures over 180 degrees would have caused extensive third-degree burns to the animals' fragile skin, resulting in severe pain, shock, swelling, blistering, and affected muscle tissue.

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington
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

Info@peta.org
PETA.org

Entities:

- PETA Asia
- PETA India
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- PETA Netherlands
- PETA Foundation (U.K.)

During a semi-annual laboratory inspection, an experimenter was found to have subjected three mice to unapproved perfusions, in which animals were cut open and tissues such as brains and other organs were preserved for collection, similar to embalming in humans—but the animals were still alive. During routine veterinarian evaluations, 15 mice who had been subjected to tumor removal surgery were discovered to have open wounds after experimenters used poor surgical technique in suturing the tissue layers around the tumor. Four of these mice were euthanized, and the other 11 were subjected to further invasive procedures to repair the botched surgery. In another incident, an unqualified experimenter, who hadn't completed the required surgical training, cut into the head of a mouse.

Experimenters failed to provide animals with appropriate medication, including pain relief, as required by the protocol. For example, in four separate incidents 77 mice, who were subjected to invasive procedures, including heart surgeries, tibia bone fracture surgeries, wound procedures, and injections behind the eyes, didn't receive preoperative or postoperative pain relief as specified in the approved protocols. In another incident, five mice underwent heart surgery and weren't given the full regimen of pain medication. One mouse was found dead two days later, and two mice were found with ruffled fur—suggesting unchecked pain. We can only imagine the suffering that they endured because of these painful, invasive experiments, in which they didn't receive the appropriate pain relief—before they were found suffering or dead *two days later*.

Experimenters in the school's laboratories failed to monitor animals or provide safe housing as required by the protocol. In one incident, experimenters subjected 30 mice to tumor implant surgery but failed to complete appropriate postoperative monitoring training or put surgery monitoring cards on the cages. Over a period of seven months, the wire bar lids and cage tops in the animal rooms of the Transgenic Mouse Facility weren't changed at the interval described in the established standard operating procedures, compromising the welfare of the animals. In another incident, 26 zebrafish died after a city water supply line burst and there were no monitoring alarms in place to notify facilities maintenance staff. Fifty mice were found in severely crowded conditions in a euthanasia chamber.

In fiscal year 2021, BCM received over \$351 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 school's failures are an abject violation of the public's trust.

BCM's negligence and disregard for basic animal welfare must not be allowed to continue. Such problems will persist unless strong deterrents are implemented. The school 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 urgently address this serious matter 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,

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