



February 27, 2023

Sunil Eappen, M.D., M.B.A.
President and Chief Medical Officer
Brigham and Women's Hospital

Via e-mail: seappen@bwh.harvard.edu

Dear Dr. Eappen:

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 Brigham and Women's Hospital (BWH) laboratories.

According to records PETA obtained through the Freedom of Information Act, **BWH reported 17 violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between June 2021 and September 2022.** The problems documented in the new case reports are reminiscent of earlier violations, which we shared in our [July 2021](#) letter to your office. That letter 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 BWH's Institutional Animal Care and Use Committee (IACUC), failed to use appropriate euthanasia methods, and failed to provide animals with food or water. We also urged the university to address the alarming culture of disregard for basic animal welfare in its laboratories. **However, the problems persist and animals continue to suffer in BWH's laboratories.**

The new records reveal that several experimenters failed to follow the experimental methods outlined in their IACUC-approved protocols, suggesting systemic problems in the school's experimentation program. Employees' negligence resulted in the suffering and deaths of numerous animals. For example, a mouse cage was sent through an autoclave—a high-temperature cage steamer used for sterilization—with three mice still inside. It's difficult to imagine the agony experienced by those mice as they were steamed to death. 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 damaged muscle tissue.

Among other serious documented issues, an experimenter performed tail biopsies—amputation of a portion of the tail—on mice over the maximum permitted age. The animals likely experienced immense stress and pain, because the distal tail is completely ossified and innervated by

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
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21 days of age. One mouse had to be euthanized. Against approved protocol, frogs were placed on ice for anesthesia during surgery. In another incident, 20 mice were injected with a substance in the incorrect location, resulting in swelling and lesions. One of them had to be euthanized.

Experimenters failed to provide animals with appropriate medication, including pain relief, in six separate incidents. For example, mice in two cages experienced pain after they were exposed to an experimental agent during surgery and experimenters failed to provide them with appropriate pain relief. One of the animals died, and the other had to be euthanized. During a semi-annual inspection, mice in three cages were found not to have received a second dose of pain medication after a procedure. In addition, the post-procedural care cards had not been filled out correctly. In another incident, mice were not given the full regimen of pain relief indicated in the protocol. The experimenter also failed to follow institutional policies regarding handling and signage for hazardous materials in animals. Four mice were discovered dead, and other animals in the group were discovered moribund and required euthanasia after they were given an unapproved drug.

Experimenters failed to follow approved euthanasia protocols in the institution's laboratories and euthanize animals in a timely manner, resulting in exacerbated suffering. In three separate incidents, experimenters violated protocols and caused mice to suffer beyond the established humane endpoints at which euthanasia is indicated due to pain or distress. For example, 18 mice were found dead or required euthanasia due to clinical concerns after the experimenter failed to adhere to veterinary orders or humane endpoint guidelines. The experimenter continued the experiments on mice even after a veterinarian ordered them to discontinue the procedures during an investigation into the incident. In another incident, four mice sustained serious wounds from fighting. One was immediately euthanized, but the others suffered when the experimenter failed to follow the veterinary directive and euthanize them. Another mouse was found with a hunched posture and ruffled fur, and several of her pups had died, yet the experimenter let her continue to suffer and didn't euthanize her according to the guidelines.

Experimenters failed to provide animals with basic necessities such as food or water. A pregnant mouse had been removed from the enclosure for euthanasia and was left in a container without water overnight. Three mice were euthanized after they weren't given enough food, experimenters failed to monitor them, and their condition deteriorated.

In fiscal year 2022, BWH received over \$381 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 institution's failures are an abject violation of the public's trust.

BWH's negligence and disregard for basic animal welfare must not be allowed to continue. Such problems will persist unless strong deterrents are implemented. The institution 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,

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

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