

February 6, 2023

Santa J. Ono, Ph.D. President University of Michigan

Via e-mail: presoff@umich.edu

Dear President Ono:

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 the University of Michigan's (U-M) laboratories.

According to records obtained by PETA through the Freedom of Information Act, U-M reported more than 18 violations of federal animal welfare guidelines in its laboratories to the National Institutes of Health's (NIH) Office of Laboratory Animal Welfare between March 2018 and June 2022, affecting nearly 12,000 animals.

Employees' negligence has resulted in suffering and death for numerous animals at U-M. In one incident, 53 mice died or were euthanized after they suffered from dehydration because staff had dislodged their water supply during cleaning and failed to notice that the animals had no access to water. In another incident, 11,548 zebrafish died after staff failed to notice that a hose had fallen into the sanitation tank and that bleach had siphoned into the fish tanks. A rabbit was discovered missing from a cage that was also missing identification records and was never found. And at least 17 live mice were put into a plastic bag for disposal after experimenters improperly performed euthanasia.

The records reveal that several experimenters failed to follow the experimental methods outlined in the protocols that had been approved by U-M's Institutional Animal Care and Use Committee (IACUC), suggesting systemic problems in the school's experimentation program. In two separate incidents, experimenters violated protocols and caused 15 mice with tumors to suffer beyond the established humane endpoints at which euthanasia is indicated due to pain or distress. In one of these incidents, experiments were conducted without IACUC approval or veterinary oversight and care. In another incident, experimenters failed to follow approved methods for tissue sampling, even after a veterinarian instructed them to discontinue the procedure, and removed a 1-inch portion of a rabbit's ear, which then became infected.

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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Experimenters failed to provide animals with appropriate medication, including pain relief. For example, 110 mice in a dental pulp exposure study failed to receive post-operative analgesia as specified in the approved protocol. Experimenters failed to use pharmaceutical-grade anesthetics on rodents and gave expired medications, including analgesics and euthanasia drugs, to animals. On two occasions, staff killed nearly 100 mice with expired drugs. Experimenters administered an unapproved drug to mice that manipulated their hormones, failed to provide mice with topical ointment (in contravention of veterinary orders), and gave expired tranquilizers to a pig used in a nonsurvival procedure.

Experimenters in the school's labs failed to monitor animals and to provide them with safe housing and transport. For example, three rabbits were transported in a container with no lid and of insufficient wall height, which could have resulted in harm to them. Staff also failed to house animals appropriately. Specifically, three mice who were infected with a parasite that causes toxoplasmosis—which leads to serious and potentially lifelong infection in humans—were held in a cage appropriate for lesser biosafety conditions. In another incident, staff failed to address a malfunctioning timer, subjecting 22 rats to illumination levels inconsistent with the proper light and dark protocols for an entire month.

In fiscal year 2022, U-M received over \$644 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.

U-M'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,

Andréa Kuchy, Ph.D.

Research Associate

Laboratory Investigations Department