



March 13, 2023

The Honorable Lloyd J. Austin III
Secretary of Defense
Department of Defense

The Honorable Christine E. Wormuth
Secretary of the U.S. Army
c/o Mark F. Averill, Administrative Assistant to the Secretary of the Army
Department of Defense

Via e-mail: ExecSecMA2@sd.mil; mark.averill.civ@army.mil

Dear Secretary Austin and Secretary Wormuth:

Thank you in advance for your time. 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 share disturbing new information related to our September 29, 2022, letter to Secretary Wormuth.¹

Based on the information presented below, we again urge you to renew the ban on weapon-wounding tests on dogs, cats, marine animals, and nonhuman primates and to no longer permit the wounding of *any* animals with weapons for medical research, development, testing, or evaluation.

Such a prohibition should apply to but not be limited to the following: an apparent military plan to expose monkeys to pulsed microwave radiation in a misguided attempt to determine human brain effects associated with an acquired neurosensory syndrome, commonly referred to as “Havana syndrome,”² and the ongoing experiment funded by the U.S. Army (award number W81XWH2211105) at Wayne State University that involves irradiating ferrets with a radio frequency (RF) directed energy weapon in an irrelevant attempt to study the cognitive, behavioral, vestibular, and cochlear health effects of Havana syndrome in humans.³

¹Wisniewska M. Letter from PETA to the Honorable Christine Wormuth. September 29, 2022. Accessed March 10, 2023. <https://www.peta.org/wp-content/uploads/2022/09/2022-09-29-request-to-army-re-reinstating-ban-on-wound-labs-1.pdf><https://www.peta.org/wp-content/uploads/2022/09/2022-09-29-request-to-army-re-reinstating-ban-on-wound-labs-1.pdf>

²Seligman L. The Pentagon is funding experiments on animals to recreate “Havana Syndrome.” *Politico*. March 9, 2023. Accessed March 10, 2023. <https://www.politico.com/news/2023/03/09/pentagon-funding-experiments-animals-havana-syndrome-00086393>

³Project Grant W81XWH2211105—The pathology of radio wave-induced brain injury. Award Profile Grant Summary. USA Spending.gov. Accessed March 10, 2023. https://www.usaspending.gov/award/ASST_NON_W81XWH2211105_2100

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Weapon-Wounding Tests on Animals Involve the Shocking Reversal of a Past Ban

In 1983, PETA exposed and successfully campaigned to shut down a U.S. Department of Defense “wound lab” in which dogs, goats, and other animals were shot with high-powered weapons to inflict injuries, leading then Secretary of Defense Caspar Weinberger to establish the first-ever permanent ban on the shooting of dogs and cats in wound labs.⁴ In 2005, the U.S. Army issued Regulation 40-33, which prohibited the use of dogs, cats, marine animals, and nonhuman primates in experiments “conducted for development of biological, chemical, or nuclear weapons.”⁵ However, in 2020, the U.S. Army—in the U.S. Army Medical Research and Development Command’s (USAMRDC) “Policy 84”—apparently reversed its position by permitting “[t]he purchase or use of dogs, cats, nonhuman primates, or marine mammals to inflict wounds upon using a weapon for the purpose of conducting medical research, development, testing, or evaluation.”⁶

Importantly, the 59th Medical Wing of the U.S. Air Force recently adopted a policy stating that its own experimentation program “does not conduct Research & Development or training protocols involving non-human primates, dogs, cats, or marine mammals”⁷—the *opposite* of the USAMRDC’s Policy 84, which allows weapon-wounding tests on these animals.

USAMRDC Tries to Keep Weapon-Wounding Tests on Animals Secret

In March 2022, PETA filed a Freedom of Information Act (FOIA) request for photos, videos, and other documentation of tests approved by the USAMRDC “that involve the use of a weapon ... to inflict wounds” on dogs, cats, marine animals, and nonhuman primates. Although the USAMRDC initially stated that it had at least 2,000 responsive records, it later backtracked, claiming to have only one such testing protocol record. Instead of embracing transparency, USAMRDC chose secrecy, claiming the responsive record to our request is “classified ... in the interest of national defense or foreign policy.”⁸ We have filed an appeal for the release of a redacted version of the requested information that should have been provided,⁹ as PETA believes is legally required. Taxpayers deserve to know what the U.S. Army is hiding by refusing to release details about its shocking weapon-wounding experiments on animals.

⁴Reprieve from wound tests is ended for pigs and goats. *The New York Times*. January 24, 1984, Section A, Page 17. Accessed March 10, 2023. <https://www.nytimes.com/1984/01/24/us/reprieve-from-wound-tests-is-ended-for-pigs-and-goats.html>

⁵U.S. Department of the Army (2005). Medical Services. *The care and use of laboratory animals in DOD Programs*. Army Regulation 40-33. Accessed March 10, 2023. https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/r40_33.pdf

⁶U.S. Army Medical Research and Development Command (2020). *Animal Research and Medical Training Involving Wounding*. Policy 84. Accessed March 10, 2023. <https://mrdc.health.mil/assets/docs/orp/acuro/MRDC-Policy-84-Wounding.pdf>

⁷The 59th Medical Wing of the U.S. Air Force. The 59th Medical Wing Instruction 40-402. September 16, 2022. Accessed March 10, 2023. <https://static.e-publishing.af.mil/production/1/59mdw/publication/59mdwi40-402/59mdwi40-402.pdf>

⁸Harris AM. Response by Freedom of Information Act Office at the Department of the Army to PETA. PDF. May 2, 2022. Accessed March 10, 2023. <https://www.peta.org/wp-content/uploads/2022/09/2022-07-15-denied.pdf>

⁹Zittkowski C. Appeal of Department of the Army’s Decision to Withhold Information in Response to FOIA Request FA-22-0021. September 29, 2022. Accessed March 10, 2023. <https://www.peta.org/wp-content/uploads/2022/09/2022-09-29-army-foia-appeal.pdf>

Biological Differences Between Species Render Test Data Irrelevant¹⁰

The decision by USAMRDC to use live animals in weapon-wounding experiments—including attempts to understand the biology of Havana syndrome in humans—is counterproductive because the “translation of preclinical outcomes is difficult due to inter-species differences such as brain anatomy, behavior, life-span and time scale of biological process, metabolomics rate, pharmacokinetic, pathophysiological responses.”¹¹

As an example, “sex differences show inter-species variability with human trials showing better outcomes following traumatic brain injury (TBI) for males. By contrast, animal trials ... show more favorable outcomes for females, with progesterone suggested as having a neuroprotective role in animals.”¹² In addition, one study evaluating “antibodies to combat neurodegenerative disorders indicated an increased neuroinflammatory response in human neural cells [but this] response [was] not observed in ... microglia of nonhuman animals.”¹³ Given numerous disparities, some experts agree that human models provide better opportunities to study the complexity of TBI and its treatment.^{14,15}

Non-Animal Wound Research Methods Are Widely Available

Modern animal-free technology allows for research into TBI phenomena. For instance, using healthy brain tissue from human patients undergoing decompressive surgery for the treatment of cerebellar herniation allowed scientists “to develop an *in vitro* organotypic model of TBI.” This “histologically normal” animal-free benchtop model offers a “sophisticated experimental [platform] and useful predictor of pathological responses seen following neurological injury”¹⁶ as seen in human victims of terrorist attacks.

The Likelihood of RF Wave Exposure as a Trigger for Havana Syndrome Has Been Rejected by Multiple U.S. Intelligence Agencies

According to the recent report by the Office of the Director of National Intelligence¹⁷ summarizing work by seven intelligence agencies on approximately 1,000 cases of “anomalous

¹⁰Darwin E, Tomic-Canic M. Healing Chronic Wounds: Current Challenges and Potential Solutions. *Curr Dermatol Rep.* 2018 Dec;7(4):296–302.

¹¹Hajiaghamemar M, Morteza SR, Oeur A, Margulies SS. Toward development of clinically translatable diagnostic and prognostic metrics of traumatic brain injury using animal models: A review and a look forward. *Exp Neurol.* 2019 Aug;318:101–123.

¹²Gupte R, Brooks W, Vukas R, Pierce J, Harris J. Sex differences in traumatic brain injury: What we know and what we should know. *J Neurotrauma.* 2019 Nov 15;36(22):3063–3091.

¹³Trudler D, Nazor KL, Eisele YS, Grabauskas T, Dolatabadi N, Parker J, Sultan A, Zhong Z, Goodwin MS, Levites Y, Golde TE, Kelly JW, Sierks MR, Schork NJ, Karin M, Ambasadhan R, Lipton SA. Soluble α -synuclein-antibody complexes activate the NLRP3 inflammasome in hiPSC-derived microglia. *Proc. Natl Acad Sci U S A.* 2021 Apr 13;118(15):e2025847118.

¹⁴Jean A, Nyein MK, Zheng JQ, Moore DF, Joannopoulos JD, Radovitzky R. An animal-to-human scaling law for blast-induced traumatic brain injury risk assessment. *Proc. Natl Acad Sci U S A.* 2014 Sep; 111(43):15310–15315.

¹⁵Tickle JA, Sen J, Adams C, Furness DN, Price R, Kandula V, Tzerakis N, Chari DM. A benchtop brain injury model using resected donor tissue from patients with Chiari malformation. *Neural Regen Res.* 2023 May; 18(5):1057–1061.

¹⁶Tickle et al. 2023.

¹⁷DNI Statement on the Intelligence Community Assessment on AHIS. Office of the Director of National Intelligence. Published March 1, 2024. Accessed March 10, 2023. <https://www.dni.gov/index.php/newsroom/press-releases/press-releases-2023/item/2361-dni-statement-on-the-intelligence-community-assessment-on-ahis>

health incidents” observed in individuals with Havana syndrome,¹⁸ it’s “very unlikely that ... a directed energy weapon [such as RF waves] ... or ... the byproduct of some other activity, including electronic surveillance ... could have made people sick.”¹⁹ In light of this report, the aforementioned ongoing experiment funded by the U.S. Army at Wayne State University, which involves blasting ferrets with an RF directed energy weapon in an attempt to induce “a neurosensory syndrome similar to that which has been found for men and women diagnosed with the Havana syndrome,”²⁰ is not only cruel and wasteful but also, frankly, futile.

PETA’s ‘Research Modernization Deal’ Provides a Solution for Human-Relevant Research

According to the U.S. National Institutes of Health, 95% of all new drugs that test safe and effective in animal experiments fail or cause harm in human clinical trials.²¹ Also, more than 90% of results from basic scientific research—much involving animal testing—fail to lead to treatments for humans.²² As a result, PETA scientists have put forward the groundbreaking Research Modernization Deal (RMD),²³ which outlines a roadmap and strategy for optimizing investment in research to cure disease—by ending funding for strategies that don’t work (experiments on animals) and investing in research that’s relevant to humans.

The National Hispanic Medical Association (NHMA), representing the interests of 50,000 licensed Hispanic physicians in the U.S., establishes in a position statement that it “does not conduct, fund, commission, or support tests on animals” and that it “strongly supports PETA’s ‘Research Modernization Deal.’” The NHMA goes on to note that “[a]nimals used in laboratory experiments are biologically, physiologically, and anatomically different from human beings, making animal testing a suboptimal and highly error-prone endeavor that costs billions of taxpayer dollars each year Everyone will benefit from replacing animal experiments with more effective human-based medical research, and PETA’s plan provides a guide for how to achieve this important transition.”²⁴

The National Medical Association (NMA), the oldest and largest national organization for African American physicians, also “does not conduct, fund, or commission tests on animals,” and the NMA “strongly supports the vision and plan articulated in PETA’s ‘Research Modernization Deal’ that offers a step-wise guide to eliminate misguided experiments on

¹⁸Harris S, Hudson J. ‘Havana syndrome’ not caused by energy weapon or foreign adversary, intelligence review finds. Washington Post. March 1, 2023. Accessed March 10, 2023. <https://www.washingtonpost.com/national-security/2023/03/01/havana-syndrome-intelligence-report-weapon/>

¹⁹Project Grant W81XWH2211105—The pathology of radio wave-induced brain injury. Award Profile Grant Summary. USA Spending.gov. Accessed March 10, 2023. https://www.usaspending.gov/award/ASST_NON_W81XWH2211105_2100

²⁰*Ibid.*

²¹Transforming translational science. The National Center for Advancing Translational Sciences. 2019. Accessed March 10, 2023. https://ncats.nih.gov/files/NCATS_Factsheet_508.pdf

²²Pound P, Bracken MB. Is animal research sufficiently evidence based to be a cornerstone of biomedical research? *BMJ*. 2014;348.

²³The Research Modernization Deal 2021. PETA. 2021. Accessed March 10, 2023. <https://www.peta.org/wp-content/uploads/2020/12/peta-2021-research-modernization-deal.pdf>

²⁴NHMA policy statements. National Hispanic Health Foundation. Accessed March 10, 2023. <https://www.nhmamd.org/nhma-policy-statements>

animals and instead prioritize more effective, ethical and economical non-animal research methods that will better advance human medical research for all.”²⁵

On September 16, 2021, in a monumental move for scientific research, motivated largely by the scientific failings of the use of animals in testing, the European Parliament passed a resolution calling on the European Commission to create an action plan to end all experiments on animals.²⁶ The resolution, which was proposed by members of the European Parliament (MEPs) who reviewed PETA’s RMD, calls for accelerating scientific innovation without the use of animals in research, regulatory testing, or education.²⁷ The MEPs have directed the European Commission to work with scientists, including those from animal protection organizations, to accomplish this goal.

Please, do the right thing by banning on all weapon-wounding tests on animals. You can contact me directly by e-mail at MaggieW@peta.org. Thank you for your consideration of this important issue. We look forward to your prompt response.

Sincerely,



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Animal Care and Use Review Office, USAMRDC (Usarmy.detrick.medcom-usarmmc.other.acuro@health.mil)

²⁵NMA Statement on Animal Testing. National Medical Association. Published May 4, 2022. Accessed March 10, 2023. <https://www.nmanet.org/news/604379/NMA-Statement-on-Animal-Testing.htm>

²⁶European Parliament. MEPs demand EU action plan to end the use of animals in research and testing. September 16, 2021. Accessed March 10, 2023. <https://www.europarl.europa.eu/news/en/press-room/20210910IPR11926/meps-demand-eu-action-plan-to-end-the-use-of-animals-in-research-and-testing>

²⁷European Parliament. Motion for a Resolution B90425/2021. Updated September 16, 2021. Accessed March 10, 2023. https://www.europarl.europa.eu/doceo/document/TA-9-2021-0387_EN.html