



June 16, 2023

Robert M. Gibbens, D.V.M.  
 Director, Animal Welfare Operations  
 Animal Care  
 Animal and Plant Health Inspection Service  
 U.S. Department of Agriculture

Via e-mail: [Robert.M.Gibbens@usda.gov](mailto:Robert.M.Gibbens@usda.gov); [ac.complaints@usda.gov](mailto:ac.complaints@usda.gov)

Dear Dr. Gibbens:

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 respectfully request swift action from the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) against the University of Washington (UW; USDA Certificate No. 91-R-0001) for its failure to meet the standard of care for animals held in its facilities, including at the affiliated Washington National Primate Research Center (WaNPRC).

According to federal records obtained by PETA through Freedom of Information Act requests, UW reported multiple violations of federal animal welfare guidelines to the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW). It appears to us that two of these reported incidents, listed below, also represent violations of the federal Animal Welfare Act (AWA) and the Animal Welfare Regulations (AWRs).

1. In a January 3, 2023, letter to OLAW, UW reported that two nonhuman primates had received a dose of an experimental antibody that was higher than what was approved in the protocol. Due to a calculation error, the animals received twice the dosage—resulting in damage to their kidneys that required veterinary intervention.
2. In a February 2, 2023, letter to OLAW, UW reported that a rhesus macaque on an approved water restricted behavioral study did not receive his/her daily ration of water, further exacerbating the animal's thirst.

We believe the treatment of nonhuman primates at UW, as indicated in the incidents described above, fails to comply with several AWRs.

### **I. Failure to adhere to protocols approved by the Institutional Animal Care and Use Committee (IACUC)**

Section 2.31(c)(7) of the AWRs states:

*With respect to activities involving animals, the IACUC, as an agent of the research facility, shall ... (6) Review and approve, require modifications in (to secure approval), or withhold approval of proposed significant changes regarding the care and use of animals in ongoing activities.*

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The failure of laboratory personnel to adhere to the experimental antibody dosage specified in the IACUC-approved protocol—as described in Incident #1—constitutes a violation of Section 2.31(c)(7) of the AWRs. Moreover, this failure resulted in two nonhuman primates experiencing a clinical adverse response, which likely exposed the animals to additional discomfort and distress.

## **II. Failure to provide water to nonhuman primates**

Section 3.83 of the AWRs states:

*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 otherwise required by the attending veterinarian, or as required by the research proposal approved by the Committee at research facilities.*

The failure of laboratory personnel to provide water to a rhesus macaque constitutes a violation of Section 3.83 of the AWRs. Moreover, as this macaque was already on a water-restricted protocol, the animal likely experienced additional discomfort and distress as a result of the laboratory's negligence.

UW's failure to comply with federal animal welfare guidelines has also impacted animals excluded from the Animal Welfare Act. While these incidents—documented in 26 case reports dated July 6, 2021 to May 12, 2023—do not fall under the USDA's purview, they offer further evidence of the problems in the school's laboratories. Mice starved to death in six separate instances in which staffers failed to feed them. Mice suffocated because ventilation to their cage was effectively cut off. Mice baked to death after an employee placed them under a heat lamp and forgot about them. There were two incidents in which mice older than 28 days were subjected to partial tail amputations without anesthesia or analgesia. In one of these cases, the laboratory worker failed to cauterize the tail. Experimenters administered the wrong dose of a drug to 123 mice over a 14-month, and watched as death rates exceeded the expected rate. Experimenters induced tumors in 80 mice but failed to monitor them. As a result, several mice developed ulcerated tumors, others developed large tumors exceeding 10% of their body weight, and three mice had already died when the failure was discovered. An experimenter was euthanizing malaria-infected mice as they had reached the experimental endpoint—but she missed one cage, extended the animals' suffering. In another incident, an experimenter was moving mouse pups from one cage to another—but missed one of the pups who was found dead the next day.

This disregard for minimum animal welfare standards cannot continue and we ask that you bring the full scope of your authority to bear in addressing the catastrophic failures in UW's laboratories.

Thank you for your attention to this urgent matter. If you have any questions, please contact me at (757) 803-6447 or [AlkaC@peta.org](mailto:AlkaC@peta.org). Thank you for your time and consideration.

Sincerely,  
Alka Chandna, Ph.D.  
Vice President  
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