



February 21, 2024

Brent C. Morse, D.V.M.
 Director
 Division of Compliance Oversight
 Office of Laboratory Animal Welfare
 National Institutes of Health

Via e-mail: MorseB@mail.nih.gov

Dear Dr. Morse:

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 your office investigate possible noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the Guide) related to the treatment of animals at MRIGlobal (Animal Welfare Assurance ID D16-00309).

According to a January 23, 2024, U.S. Department of Agriculture (USDA) inspection report for MRIGlobal, a Göttingen minipig “became hypothermic while under anesthesia due to a lack of monitoring and insufficient warming.” On November 9, 2023 at 8:34am, the pig was put under anesthesia, and a senior veterinarian came into the room and told staff to provide the pig with thermal support around 9:00am. Warmed saline bags were placed beside the pig. At 10:35am, the attending veterinarian (AV) came into the room and asked if the pig’s temperature had been checked. It had not been, and the pig’s temperature was then checked as being 93.2 degrees Fahrenheit, several degrees lower than a normal temperature of 99-100 degrees. A warm blanket was then wrapped around the pig. It wasn’t until that point that staff began to use anesthesia monitoring forms and record the pig’s temperature. At 11:30am, the pig’s temperature was 91.4 degrees, at 11:45 it was 90.4 degrees, and by 12:05 the pig was awake.

A facility investigation revealed that the study coordinator had not assigned anyone to monitor the pig, and the protocol for the study did not provide information about temperature monitoring. The inspection report notes, “General anesthesia is always a risk, and it is not possible to predict how each animal will respond. For these reasons, properly trained staff to administer anesthesia and monitor the animal’s response to it must be present and attentive.”

The inspection report also details the injuries, and subsequent euthanasia, of four guinea pigs. Between December 1st and 4th, 2023, three guinea pigs developed hind leg lameness and were euthanized. Necropsies showed leg injuries in all three: a fracture in the left rear leg, a fracture of the right rear leg, and a severe left knee injury. The guinea pigs had been in “beddingless” enclosures, in which “the flooring system has many small circular holes that allow for waste to pass

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through and has larger square openings in a triangular pattern at each corner that are slightly larger and appear large enough that a guinea pig's foot could fall through." Staff then moved the guinea pigs to another enclosure with a solid floor, and the only additional injury to present was one guinea pig who had lameness in a front leg—an injury suspected to have been sustained prior to moving enclosures but not noticed until three days later. This fourth guinea pig was also euthanized. The manufacturer of the “beddingless” enclosures “confirmed that these types of injuries were a known animal welfare problem” with the enclosures.

The issues raised in the USDA’s complaint for MRIGlobal—failure of veterinary staff to provide appropriate care during a procedure, failure of the Institutional Animal Care and Use Committee (IACUC) and the AV to ensure and monitor the administration of appropriate veterinary care, and failure to provide a safe enclosure and protect the animals from injury—also indicate noncompliance with PHS Policy and the Guide. These issues include the following:

1. Failure of veterinary staff to provide appropriate care during a procedure

The Guide states, “Successful surgical outcomes require appropriate attention to presurgical planning, personnel training, anesthesia, aseptic and surgical technique, assessment of animal well-being, appropriate use of analgesics, and animal physiologic status during all phases of a protocol involving surgery and postoperative care” (p. 115).

In the incident with the pig at MRIGlobal, attention was not given to presurgical planning, personnel training, assessment of animal well-being, or animal physiologic status given that the pig was not monitored while under anesthesia and became increasingly hypothermic—and that the study coordinator did not even assign anyone to do the monitoring.

2. Failure of the IACUC and AV to ensure and monitor the administration of appropriate veterinary care

The Guide instructs that an institution’s animal care and use program must include adequate policies, procedures, and practices “to achieve the humane care and use of animals in the laboratory and throughout the institution” (p. 6). Additionally, the institution must maintain an environment in which the IACUC can “function successfully to carry out its responsibilities” and the institution is responsible for ensuring that “IACUC members are provided with training opportunities to understand their work and role” (pp. 6 and 17). Furthermore, the IACUC is responsible for “assessment and oversight” of the institution and should have “sufficient authority and resources (e.g., staff, training, computers, and related equipment) to fulfill this responsibility” (pp. 14–15).

The IACUC, along with the AV, is “responsible for determining that personnel performing surgical procedures are appropriately qualified and trained in the procedures” (p. 116). The Guide also maintains that the AV “is responsible for the health and well-being of all laboratory animals used at the institution. The institution must provide the AV with sufficient authority, including access to all animals, and resources to manage the program of veterinary care” (p. 14).

In addition to establishing this responsibility of the IACUC and the AV, the Guide addresses the importance of the proper training for staff involved in animal care and procedures. It states, “Personnel caring for animals should be appropriately trained ... and the institution should provide for formal and/or on-the-job training to facilitate effective implementation of the Program and the humane care and use of animals. Staff should receive training and/or have the experience to complete the tasks for which they are responsible” (p. 16). Furthermore, “[t]he institution should provide appropriate education and training to members of research teams—including principal investigators, study directors, research technicians, postdoctoral fellows, students, and visiting scientists—to ensure that they have the necessary knowledge and expertise for the specific animal procedures proposed and the species used” (pp. 16–17).

The IACUC also has the responsibility—under federal law, regulations, and policies—to continually monitor the use and care of animals (p. 33). Post-approval monitoring includes “observation of animals by animal care, veterinary, and IACUC staff and members” (p. 33).

The failure of the IACUC and AV at MRIGlobal to ensure that veterinary staff provided appropriate veterinary care—which caused the pig to become hypothermic under anesthesia due to a lack of monitoring and insufficient warming—illustrates that the institution didn’t maintain an environment in which the IACUC could successfully fulfill its responsibilities and that the IACUC and AV failed in their oversight of animal care.

3. Failure to provide a safe enclosure and protect the animals from injury

The Guide outlines that an enclosure “should be designed and manufactured to prevent accidental entrapment of animals or their appendages” and, “[i]n the case of perforated or slatted floors, the holes and slats should have smooth edges. Their size and spacing need to be commensurate with the size of the housed animal to minimize injury” (p.51). In regard to rodents, the Guide explains:

When given the choice, rodents prefer solid floors (with bedding) to grid... Animals should have adequate bedding substrate and/or structures for resting and sleeping. For many animals (e.g., rodents) contact bedding expands the opportunities for species-typical behavior such as foraging, digging, burrowing, and nest building... Moreover, it absorbs urine and feces to facilitate cleaning and sanitation. If provided in sufficient quantity to allow nest building or burrowing, bedding also facilitates thermoregulation (p.52).

The Guide also states, “Appropriate housing strategies for a particular species should be developed and implemented by the animal care management, in consultation with the animal user and veterinarian, and reviewed by the IACUC. Housing should provide for the animals’ health and well-being while being consistent with the intended objectives of animal use” (p.52).

The use of the “beddingless” enclosures for guinea pigs at MRIGlobal caused injury, deprived guinea pigs of the opportunity to engage in natural behaviors, and reflected a lack of attention by the IACUC and AV to the housing needs and well-being of the

species. The “beddingless” enclosures were known to cause leg injuries, and the facility leadership should have been aware of that fact and not used the enclosures for guinea pigs.

We urge you to investigate the concerns summarized in this letter and to take swift and decisive action against MRIGlobal. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Schemkes', written in a cursive style.

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PETA