



April 9, 2024

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

The Honorable Carlos Del Toro
Secretary of the Navy
c/o Beibhinn Steiner, Special Assistant

Via e-mail: ExecSecMA2@sd.mil; Beibhinn.Steiner@navy.mil

Dear Secretaries Austin and Del Toro:

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 letters to Secretary Del Toro dated June 8, 2022,¹ and February 1, 2023²; our letter to Secretary Austin dated September 1, 2022³; and our letter to both of you dated July 20, 2023,⁴ in which we critiqued gruesome U.S. Navy-funded decompression sickness/illness (DCS/DCI) and oxygen toxicity experiments on animals at Duke University, the University of Maryland–Baltimore, the University of California–San Diego (UCSD), and the University of South Florida (USF).

Based on new records obtained by PETA and presented below, we urge you to ban the conducting and funding of the U.S. Navy's DCS/DCI and oxygen toxicity experiments on all animals and instead pursue animal-free, human-relevant research. Our request is supported by a new letter (enclosed) signed by more than 100 U.S. Navy veterans.

¹Pons S, Balsam MJ. Letter from PETA to the Honorable Carlos Del Toro. June 8, 2022. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2022/08/2022-06-08-letter-to-usn-re-dcs-tests.pdf>

²Wisniewska M. Letter from PETA to the Honorable Carlos Del Toro. February 1, 2023. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/02/2023-01-31-letter-to-sec-nav-re-uwmadison-ending-decompression-research-sheep.pdf>

³Swaminathan S. Letter from PETA to the Honorable Lloyd J. Austin III. September 1, 2022. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2022/09/2022-09-01-letter-to-sec-of-defense-1.pdf>

⁴Wisniewska M. Letter from PETA to the Honorable Lloyd J. Austin III and the Honorable Carlos Del Toro. July 20, 2023. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/07/2023-07-20-letter-to-navy-army-re-ending-dcs-viv-w-foia-ex.pdf>

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New Records Confirm Negligence and Death of Animals in DCS/DCI Tests at Naval Medical Research Centers

PETA has recently obtained records confirming egregious distress endured by animals during cruel and ineffective DCS/DCI tests on animals, including rats and pigs, currently underway at the Naval Medical Research Command (NMRC) in Silver Spring, Maryland:

- Two pigs on an NMRC experimentation protocol had to be euthanized due to an apparently unexpected negative reaction to doxycycline administration. In one incident on February 9, 2022, a pig was reported to have rising temperatures, accompanied by clear signs of acute distress, including restlessness, vocalization, and thrashing. The animal likely suffered for up to four hours before being euthanized due to “bloat and fever.” Additionally, there were documented scratches on the pig’s face upon arrival at the facility.⁵
- On March 2, 2022, following doxycycline administration to another pig, escalating temperatures and thrashing were documented, leading to euthanasia, this time attributed to malignant hyperthermia. The suspicion of post-sedation distress, possibly induced by a reaction to ketamine, and the ineffectiveness of administering sedatives added to the prolonged suffering of the animal.⁶
- In another dire incident, an equipment malfunction resulted in the death of a rat due to lack of oxygen,⁷ contravening an NMRC assurance of responsibility agreement for the “health, comfort, welfare, and well-being of the research animals.”⁸ This incident wasn’t reported by the experimenter—presumably to the NMRC Institutional Animal Care and Use Committee (IACUC)—for 23 days after the rat’s death.⁹

In other invasive procedures, NMRC experimenters cut into the bodies of pigs as young as 3 months old and implant devices into their chests. The experimenters cut open the animals’ necks for catheter and airway tube insertion, and the animals are then confined in a hyperbaric chamber, where they are exposed to high pressures for up to 205 hours, after which they are killed.¹⁰

Additional Records Confirm Painful DCS/DCI Experiments at UCSD

According to new records PETA recently obtained from UCSD, at least 100 rats are to be subjected to painful experimental procedures funded by the U.S. Navy in purported

⁵NMRC. Responsive Records. Accessed March 11, 2024. https://www.peta.org/wp-content/uploads/2023/11/57015_Redacted.pdf

⁶NMRC. Responsive Records. Accessed March 11, 2024. https://www.peta.org/wp-content/uploads/2023/11/57117_Redacted.pdf

⁷NMRC. Responsive Records. Accessed March 11, 2024. https://www.peta.org/wp-content/uploads/2023/10/IACUC-memo-Mechanical-Failure-19-OUMD-34_Redacted.pdf

⁸NMRC. Responsive Records. Accessed March 11, 2024. https://www.peta.org/wp-content/uploads/2023/11/HBSF6-Animal-Use-Protocol-PI-Assurance-Signature-Page_b6-Signed_Redacted.pdf

⁹NMRC. Responsive Records. Accessed March 11, 2024. https://www.peta.org/wp-content/uploads/2023/10/IO-Final-Report-to-OLAW-Mechanical-Failure-in-Dive-Chamber_b6_Redacted.pdf

¹⁰NMRC. Responsive Records. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/10/nmrc-dcs-dci-pigs.pdf>

attempts to understand DCS/DCI in humans.¹¹ These procedures involve making the animals inhale radioactive gas, confining them in decompression chambers at pressures as high as 700kPa, forcing them to run on a treadmill, and shocking them if they fail to do so¹²—which we pointed out in our previous complaints to you¹³ and to UCSD Chancellor Pradeep Khosla, both dated July 20, 2023.¹⁴ The UCSD protocol appears to offer conflicting statements about anesthetizing rats for these experiments. In one instance, the protocol states, “Animals will first be placed in the chamber for compression/decompression *The rats will be awake during this procedure* as has been done in previous publications” [*emphasis added*], whereas this protocol also states, “Please note that while animals may die from decompression sickness, *no animal will ever be conscious after compression has begun*, until euthanasia” [*emphasis added*].¹⁵

This UCSD protocol also indicates significant possibilities of prolonged pain and suffering in the rats used in the proposed experiments, stating, “Since death from decompression sickness can be quick and sudden we are unlikely to be able to consistently intervene and euthanize dying animals before the sickness kills them. Further, the bubbles that lead to death are exactly what we plan to image, so seeing how they develop in dying and surviving animals at very late stages is important.”¹⁶ There is also a reported possibility of the anesthesia wearing off, thereby subjecting the rats to painful symptoms of decompression, including pain, dizziness, disorientation, and even death.¹⁷ The rats may also experience “distress” and “discomfort from physical exertion” from being forced to run on a treadmill, vocal cord damage, lung injury, stomach injury, possible bleeding, airway damage, and airway clogs that may result in drowning, all potentially caused by intubation and ventilation.¹⁸

USF Experimenter Seemingly Misleads Colleagues Regarding Oxygen Toxicity Experiments

In new records obtained by PETA from USF, experimenter Jay Dean, who reportedly conducts oxygen toxicity experiments on mice and rats,¹⁹ stated in an e-mail to his colleagues that “in my case, they [PETA] named me and said my research was done

¹¹UCSD. Responsive Records. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/11/ucsd-decompression-iacuc-protocol.pdf>

¹²*Id*

¹³Wisniewska M. Letter from PETA to the Honorable Lloyd J. Austin III and the Honorable Carlos Del Toro. July 20, 2023. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/07/2023-07-20-letter-to-navy-army-re-ending-dcs-viv-w-foia-ex.pdf>

¹⁴Swaminathan S. Letter from PETA to UCSD. July 20, 2023. Accessed March 20, 2024. <https://www.peta.org/wp-content/uploads/2023/07/2022-07-20-letter-to-ucsd-re-navy-decompression-viv.pdf>

¹⁵UCSD. Responsive Records. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/11/ucsd-decompression-protocol.pdf>

¹⁶*Id*

¹⁷UCSD. Responsive Records. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2023/11/animal-pain-and-distress-ucsd-decompression.pdf>

¹⁸*Id*

¹⁹U.S. Navy. Responsive Records. BUMED Animal Use Appendix for Research Involving Animals. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2024/03/usf-bumed.pdf>

without pain relief (not true) and that I should be stopped.”²⁰ However, his assertion appears incorrect, according to previous records PETA received from the U.S. Navy showing that Dean’s oxygen toxicity experiment on mice and rats is listed as “Category E”—classified as experimentation in which “pain or distress or potential pain or distress that is *not* relieved with anesthetics, analgesics and/or tranquilizer drugs or other methods for relieving pain or distress”²¹ [*emphasis added*].

Request for Action

As we have emphasized in our prior letters, there is no scientific, legal, or ethical justification for subjecting animals to DCS/DCI and/or oxygen toxicity experiments. We urge you to immediately ban all DCS/DCI and oxygen toxicity experiments on animals conducted and/or funded by the U.S. Navy and instead shift to cutting-edge, human-relevant research methods that would be directly applicable to advancing the health and well-being of military personnel and, ultimately, the public.

Thank you for your time and consideration of this important matter. You can contact me at ShriyaS@peta.org. I look forward to your response.

Sincerely yours,



Shriya Swaminathan
Science Policy Advisor
International Laboratory Methods
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Enclosure

Letter from U.S. Navy veterans

²⁰USF. Responsive Records. E-Mail from Jay Dean to Jason Ramage. July 24, 2023. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2024/03/jay-dean-email.pdf>

²¹U.S. Navy. Responsive Records. BUMED Animal Use Appendix for Research Involving Animals: Abbreviated Version. Accessed March 11, 2024. <https://www.peta.org/wp-content/uploads/2024/03/usf-bumed.pdf> (Page 2)

April 9, 2024

The Honorable Carlos Del Toro
Secretary of the Navy

The Honorable Lloyd J. Austin III
Secretary of Defense

Dear Secretaries Del Toro and Austin:

Thank you for your leadership and dedicated service to our country. As U.S. Navy veterans, we're disturbed to learn about the abuse of animals during decompression sickness/illness (DCS/DCI) and oxygen toxicity experiments conducted or funded by our military branch. We respectfully urge you to end the Navy's use of all animals in DCS/DCI and oxygen toxicity experiments and instead use superior, human-relevant, animal-free research methods.

In the Navy's DCS/DCI and oxygen toxicity studies, sheep were exposed to high-pressure conditions similar to what a human diver would experience at 257 feet below sea level. Experimenters have admitted that sheep used in these tests endured cardiovascular collapse, spinal cord injury, paralysis, and other conditions that frequently result in the animals' deaths.

In 2010, the Navy canceled its funding for such controversial animal testing at the University of Wisconsin–Madison amid a criminal investigation in which the special prosecutor concluded that “[t]here is no doubt that the animal suffers during the period from leaving the chamber until the ultimate injection to euthanize the animal.” While the Navy resumed paying \$389,000 for similar decompression tests on sheep at that university, this funding was “terminated” in 2022—up to two years early after a complaint sent to you by People for the Ethical Treatment of Animals (PETA).

Regrettably, the Navy continues to waste taxpayer money on similar animal testing at other universities. This funding includes nearly \$1 million being paid through 2025 to University of Maryland–Baltimore experimenter Stephen Thom, who has conducted decompression tests on more than 2,100 mice and continues to subjects the animals to excruciatingly high pressures and central nervous system injuries. The Navy has other ongoing DCS/DCI and oxygen toxicity tests on animals at the University of South Florida, Duke University, and the University of California–San Diego.

The results of such testing on animals are useless to humans due to the major anatomical and physiological differences between the species. The British and French navies have already scrapped their respective decompression experiments on animals. There are better ways to investigate DCS/DCI and oxygen toxicity phenomena, including in vitro studies and analysis of existing human-diver data.

We stand with the more than 75,000 people who have already called on the Navy and the U.S. Department of Defense to end such animal testing in favor of non-animal research. Thank you for considering our request.

Sincerely yours,

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