



May 9, 2024

Roxanne Mullaney, D.V.M.
Deputy Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: Roxanne.C.Mullaney@usda.gov

Dear Dr. Mullaney:

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 the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) investigate the University of Maryland–Baltimore (UMB; USDA Certificate No. 51-R-0018) for failing to submit a required exception.

Under the federal Animal Welfare Act (AWA), the annual report that a research facility submits to APHIS shall do the following:

Assure that the facility is adhering to the standards and regulations under the Act, and that it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the IACUC [Institutional Animal Care and Use Committee]. A summary of all such exceptions must be attached to the facility's annual report. In addition to identifying the IACUC-approved exceptions, this summary must include a brief explanation of the exceptions, as well as the species and number of animals affected. 9 CFR 2.36(b)(3).

UMB apparently violated this AWA requirement by not obtaining and submitting a required exception for the experiments of Eugene Albrecht that involved multiple major survival surgeries on baboons.

Albrecht uses olive baboons to purportedly study the role of hormones during pregnancy—and in his experiments, pregnant baboons are subjected to daily injections of hormones and repeatedly sedated for blood draws, muscle biopsies, and various physiological tests. At early, mid, or late gestation, the baboons are subjected to a cesarean section and their babies are typically killed.

According to a November 17, 2021, USDA inspection report for UMB, the facility was cited for violating 9 CFR 2.31(d)(1)(x) by having two IACUC-approved protocols that involved multiple cesarean sections on female baboons when the facility had “not sought or received approval from the [APHIS] Administrator for any of the animals [who] have undergone multiple major

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operative procedures on these protocols.” Additionally, the protocols “did not provide a scientific justification” for the multiple major survival surgeries.

Despite the USDA’s direction to correct this violation of the AWA by December 23, 2021, the UMB annual reports for 2021 and 2022 (and other previous years, back to 2014) don’t include an exception for multiple major survival surgeries.

We urge you to investigate UMB’s failure to submit the required exception for multiple protocols, including multiple cesarean sections on baboons. We also ask that you take swift and decisive action, including issuing citations and fines.

Thank you for your consideration of this important matter. You can contact me at AmandaSc@peta.org.

Sincerely,



Amanda Schemkes, J.D., M.S.
Laboratory Oversight Specialist
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PETA

cc: Animal Care Complaints, APHIS, USDA (AC.Complaints@usda.gov)
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