



April 28, 2023

Charles W. Kaspar
Director
The Food Research Institute
University of Wisconsin-Madison
3554 Microbial Sciences Building
1550 Linden Dr.
Madison, WI 53706

Via e-mail: cwkaspar@wisc.edu

Dear Dr. Kaspar,

Thank you in advance for your time. I am writing on behalf of People for the Ethical Treatment of Animals (PETA). PETA entities have more than 9 million members and supporters globally. Based on the information presented below, we respectfully request that The Food Research Institute (FRI) at the University of Wisconsin-Madison stop conducting and funding tests on animals.

FRI has conducted and/or funded numerous cruel experiments on animals. Below are examples from FRI's experiments published just since 2017 and conducted for curiosity—despite their inapplicability to human health, the availability of superior non-animal research methods, and the absence of any regulations that require the use of animals for this purpose:

- Experimenters force-fed mice feces containing the parasite *Entamoeba*, fed them an antibiotic, and killed and dissected them.¹
- Experimenters injected mice with botulinum bacteria and waited for them to die from the toxin.^{2,3}
- Experimenters repeatedly force-fed mice bacteria, suffocated them to death, and dissected them.⁴

¹ Mendoza Cavazos C, Heredia MY, Owens LA, Knoll LJ. Using *Entamoeba muris* To Model Fecal-Oral Transmission of *Entamoeba* in Mice [published online ahead of print, 2023 Feb 6]. *mBio*. 2023;e0300822. doi:10.1128/mbio.03008-22

² Inzalaco HN, Tepp WH, Fredrick C, Bradshaw M, Johnson EA, Pellett S. Posttranslational Regulation of Botulinum Neurotoxin Production in *Clostridium botulinum* Hall A-*hyper*. *mSphere*. 2021;6(4):e0032821. doi:10.1128/mSphere.00328-21

³ Fredrick CM, Lin G, Johnson EA. Regulation of Botulinum Neurotoxin Synthesis and Toxin Complex Formation by Arginine and Glucose in *Clostridium botulinum* ATCC 3502. *Appl Environ Microbiol*. 2017;83(13):e00642-17. Published 2017 Jun 16. doi:10.1128/AEM.00642-17

⁴ Oh JH, Lin XB, Zhang S, et al. Prophages in *Lactobacillus reuteri* Are Associated with Fitness Trade-Offs but Can Increase Competitiveness in the Gut Ecosystem. *Appl Environ Microbiol*. 2019;86(1):e01922-19. Published 2019 Dec 13. doi:10.1128/AEM.01922-19

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Info@peta.org
PETA.org

Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

- Experimenters mated monkeys, force-fed them whipping cream contaminated with *Listeria* that caused death in some fetuses, repeatedly took their blood, cut them open and took the dead fetuses and some tissue from the mothers, and dissected the fetuses.^{5,6}
- Experimenters injected mice with botulinum bacteria.^{7,8}

Animal testing does not help to advance human health. It is no secret that 95% of new medications found to be safe and effective in animals fail in human clinical trials.⁹ Also, more than 90% of results from basic scientific research—much involving animal testing—fails to lead to treatments for humans.¹⁰ Further, up to 89% of all preclinical research, a large part of which involves animal testing, could not even be reproduced from one laboratory to the next,¹¹ indicating that the data from animal testing is not reliable. (For more details, please see PETA’s Research Modernization Deal,^{12,13} which has received support from numerous medical experts like the National Medical Association, the National Hispanic Medical Association, and others.¹⁴)

Advanced *in vitro* and computational models are widely used for researching the safety and mechanisms of the effect of foods and other substances on human health. There is no law that requires animal tests for curiosity-driven basic research. In fact, a trend of the exact opposite is happening. In September 2021, the European Parliament voted almost unanimously in favor of developing an action plan to end *all* experiments on animals,¹⁵ after discussions with PETA entities and reading our Research Modernization Deal. In August 2022, 1.4 million people across the European Union signed the “Save Cruelty Free Cosmetics” European citizens’ initiative,

⁵ Wolfe B, Kerr AR, Mejia A, Simmons HA, Czuprynski CJ, Golos TG. Sequelae of Fetal Infection in a Non-human Primate Model of Listeriosis. *Front Microbiol.* 2019;10:2021. Published 2019 Sep 11. doi:10.3389/fmicb.2019.02021

⁶ Wolfe B, Wiepz GJ, Schotzko M, et al. Acute Fetal Demise with First Trimester Maternal Infection Resulting from *Listeria monocytogenes* in a Nonhuman Primate Model. *mBio.* 2017;8(1):e01938-16. Published 2017 Feb 21. doi:10.1128/mBio.01938-16

⁷ Golden MC, Wanless BJ, David JRD, et al. Effect of Cultured Celery Juice, Temperature, and Product Composition on the Inhibition of Proteolytic *Clostridium botulinum* Toxin Production. *J Food Prot.* 2017;80(8):1259-1265. doi:10.4315/0362-028X.JFP-17-011

⁸ Golden MC, Wanless BJ, David JRD, et al. Effect of Equilibrated pH and Indigenous Spoilage Microorganisms on the Inhibition of Proteolytic *Clostridium botulinum* Toxin Production in Experimental Meals under Temperature Abuse. *J Food Prot.* 2017;80(8):1252-1258. doi:10.4315/0362-028X.JFP-17-012

⁹ The National Center for Advancing Translational Sciences. Transforming Translational Science. NIH.gov. 2019. Accessed April 28, 2023. https://ncats.nih.gov/files/NCATS_Factsheet_508.pdf.

¹⁰ Pound P, Bracken MB. Is animal research sufficiently evidence based to be a cornerstone of biomedical research?. *BMJ.* 2014;348:g3387. Published 2014 May 30. doi:10.1136/bmj.g3387

¹¹ Freedman LP, Cockburn IM, Simcoe TS. The Economics of Reproducibility in Preclinical Research [published correction appears in *PLoS Biol.* 2018 Apr 10;16(4):e1002626]. *PLoS Biol.* 2015;13(6):e1002165. Published 2015 Jun 9. doi:10.1371/journal.pbio.1002165

¹² PETA. The Research Modernization Deal. Updated September 2022. Accessed April 28, 2023. <https://www.peta.org/wp-content/uploads/2023/01/peta-research-modernization-deal.pdf>

¹³ PETA. PETA Outlines a New Deal to Revamp Laboratory Research. n.d. Accessed April 28, 2023. <https://headlines.peta.org/research-modernization-new-deal/>

¹⁴ PETA. More Endorsements of the Research Modernization Deal. n.d. Accessed April 28, 2023. <https://headlines.peta.org/research-modernization-new-deal/more-endorsements-research-modernization-deal/>

¹⁵ European Parliament. MOTION FOR A RESOLUTION on plans and actions to accelerate the transition to innovation without the use of animals in research, regulatory testing and education. September 8, 2021. Accessed April 28, 2023. https://www.europarl.europa.eu/doceo/document/B-9-2021-0425_EN.html

which calls on the European Commission to phase out *all* animal testing.¹⁶ In December 2022, with PETA and many partner organizations' efforts, the U.S. FDA Modernization Act 2.0 was approved, eliminating the decades-old animal testing requirements for new drugs and biologics before human trials.¹⁷

Due to the ethical concerns with using animals for testing, the readily available animal-free research methods, consumers' increasing awareness and hence avoidance of products associated with animal testing, there has been a major shift in the global food and beverage industry away from animal testing. More than 170 food and beverage companies have banned animal testing that are not explicitly required by law after discussions with PETA, and 56 of them used to conduct, fund, or commission tests on animals.¹⁸ Among these companies, Kikkoman is also one of FRI's corporate sponsors. After hearing from PETA, Kikkoman has agreed to request that its funds to the FRI now be directed toward educational programs, special meetings, and administrative expenses—instead of cruel, pointless tests on animals.¹⁹

We ask that FRI please join Kikkoman and the larger food industry's shift toward human-relevant research by no longer conducting and funding tests on animals that are not explicitly required by law. Thank you for your consideration, and I look forward to your response.

Sincerely yours,



Frances Cheng, Ph.D.
Chief Scientist, International Laboratory Methods
Laboratory Investigations Department

¹⁶ European Union. Save Cruelty Free Cosmetics - Commit to a Europe Without Animal Testing. Updated October 13, 2022. Accessed April 28, 2023. https://europa.eu/citizens-initiative/initiatives/details/2021/000006_en

¹⁷ Meredith Wadman. FDA no longer needs to require animal tests before human drug trials. *Science.org*. January 10, 2023. Accessed April 28, 2023. <https://www.science.org/content/article/fda-no-longer-needs-require-animal-tests-human-drug-trials>

¹⁸ PETA. Victory! Global Food Industry Ditches Deadly Animal Tests—See the List. Accessed April 28, 2023. <https://www.peta.org/features/victories-food-drink-companies-refuse-animal-tests/>

¹⁹ PETA. Victory! Kikkoman Stops Funding UW-Madison's Cruel Tests on Animals. Accessed April 28, 2023. <https://www.peta.org/blog/soy-sauce-giant-kikkoman-stops-funding-uw-madison-tests-on-animals/>