



June 10, 2025

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Acting Director  
Division of Compliance Oversight  
Office of Laboratory Animal Welfare

Via e-mail: [Jacquelyn.Tubbs@nih.gov](mailto:Jacquelyn.Tubbs@nih.gov)

Dear Dr. Tubbs:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 9 million members and supporters 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 Palamur Biosciences Private Limited (Palamur; PHS-Approved Animal Welfare Assurance #F25-00645), located in Mahabubnagar, Telangana in India.

PETA recently received alarming reports from insiders at Palamur, detailing the abuse and neglect of dogs, pigs, and monkeys at the facility. The incidents described below, from 2021 to 2023, are supported by photographs and video evidence. If accurate, we believe the alleged treatment of animals at Palamur reflects a deeply troubling and persistent pattern of noncompliance with PHS Policy and the *Guide*.

The insiders made the following allegations:

1. Beagles:

- a. Palamur kept more beagles than the facility could properly house—nearly 1,500 dogs in a space designed for only 800, forcing three to four dogs into cages meant for just two. Overcrowding was particularly pronounced in Palamur's breeding facility. According to one insider, when auditors came to inspect the facility, company representatives were careful to show them the research and other facilities, steering clear of the breeding facility.
- b. Palamur begins breeding dogs when they are approximately 18 months of age. They are bred twice a year, and although the company's policy is to breed the dogs for a maximum of five breeding cycles, the company often ignores its own policy, exceeding that limit. Dogs as old as 13 years have been used for breeding. The company's practice of breeding dogs too frequently—without allowing the mothers adequate time to rest and recover between pregnancies—placed immense physical strain on their bodies. This overbreeding significantly increased

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the risk of dystocia (difficult labor) and the need for cesarean (C-section) deliveries.

- c. The overcrowding, coupled with a lack of socialization, led to extreme frustration, food aggression, and frequent fights, often causing serious injuries, especially to the dogs' ears. Despite these wounds, the company failed to provide basic care, neglecting both proper wound cleaning and pain management.
- d. Animal care staff at Palamur were seen handling dogs roughly, with some workers kicking the animals or carelessly closing cage doors on their legs. Workers would pick up dogs, some weighing as much as 15 kilograms, by the scruff of the neck or the skin on their backs. Although the company offers some training, it fails to ensure workers follow proper handling methods, as captured on CCTV, where an employee slammed a cage door on a dog's leg, prompting the dog to yelp in pain.
- e. In some studies conducted by the company, dogs were injected with test compounds under the skin (subcutaneously). These injections—either due to the compounds themselves or impurities in their formulation—sometimes caused infections at the injection sites. There can be inflammation, an abscess, and open wounds. Depending on the location of the abscess, there can be further health issues suffered by the dogs. For example, if the abscess is in the shoulder, that can inhibit the dog's ability to move. They can be in severe pain; they will lose their appetite and lose weight. These infections could spread, eating through the skin and damaging the underlying tissue, leaving the dogs with open, painful wounds.
- f. In other studies, dogs became very sick, and in one case, a dog vomited excessive quantities of blood before dying.
- g. Although the company specifies "humane endpoints" in the protocol, that endpoint only exists on paper. Management will tell veterinarians to wait for the sponsor to give permission before euthanizing an animal who is suffering. Everything is decided by the sponsor. If the sponsor approves euthanasia or some other action, the veterinarians can pursue such actions. Otherwise, the animal is kept suffering. One insider reported that some animals suffered ulcers in their mouth and intestine from the oral dosing procedure—but they were kept alive unless the sponsor approved euthanasia.
- h. The company kills dogs using thiopentone but fails to sedate them beforehand—a basic step that could reduce their fear and distress in their final moments.

## 2. Minipigs:

- a. Palamur purchased Göttingen minipigs from a company in Denmark, but did not have a license to breed them. At one point, a minipig became pregnant, and the head veterinarian ordered the euthanasia of the eight to ten piglets born. The piglets were killed via intracardiac injection, but were not sedated first—a basic step that could have significantly reduced their fear and suffering.
- b. Despite a written policy requiring playtime and social enrichment for pigs, Palamur routinely failed to provide either. Pigs would only be given access to enrichment when customers were visiting; otherwise, they remained confined to their cages and were only removed for experimental procedures.
- c. During a visit to Palamur, representatives from the Danish company observed that pigs' feet were getting injured due to improper flooring.

### 3. Monkeys:

- a. Palamur captured rhesus macaques from a forest in the state of Rajasthan in India. The company had permission from the Indian government to capture 12 monkeys, but it captured 14. The monkeys were approximately 1.5 years of age and weighed less than 4 kilograms. The monkeys were sedated and placed in plastic bags, with up to five monkeys in each bag.
- b. In Rajasthan, blood samples were taken from the monkeys and two monkeys tested positive for monkeypox, which is a zoonotic disease. The other monkeys tested negative for monkeypox. However, all of the monkeys were already on their way to the company's facility in Telangana State. When the monkeys arrived at the facility, the two monkeys who had tested positive for monkeypox were killed, but the others were kept—even though they had been transported from Rajasthan with the positive monkeys and monkeypox can be transmitted between monkeys.<sup>1</sup> The 12 surviving monkeys were again tested for monkeypox one week after they arrived at the company's facility, even though the incubation period for the virus is longer than a week and can be one month or longer, depending on the route of transmission. However, the company needed the monkeys for a client-sponsored test and decided to go forward with using the monkeys for the test.
- c. Despite the risk to company employees and the community at large, the company kept the matter quiet and simply killed the monkeys.

These incidents point to serious lapses in Palamur's adherence to the *Guide*, including violations of the following provisions:

1. Failure to handle animals humanely and in a manner that minimizes discomfort, distress, and pain to them;
2. Failure to implement an adequate animal care and use program, including a program of adequate veterinary care and use of humane endpoints and appropriate methods of euthanasia;
3. Failure to provide safe housing for dogs and pigs;
4. Failure to promote the psychological well-being of the animals; and
5. Failure to ensure adherence to occupational health and safety measures.

#### **I. Inhumane Handling of Animals and Failure to Minimize Pain, Distress, and Discomfort**

The *Guide* specifies that “proper care, use, and humane treatment” must be incorporated into all aspects of animal use. Further, facilities are advised to employ husbandry methods aimed at “enhanc[ing] animal well-being and minimiz[ing] or eliminat[ing] pain and distress” to animals. Furthermore, Principle IV of the PHS Policy-endorsed U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training emphasizes the “imperative” to avoid or minimize “discomfort, distress, and pain” to animals.

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<sup>1</sup> According to the scientific literature, transmission of monkeypox can occur through direct contact with lesions, bodily fluids, or respiratory secretions; fomites, such as contaminated bedding or cages; aerosol transmission, especially in confined settings.

However, the insiders' reports and evidence of rough handling of dogs at Palamur indicate that this guidance is routinely disregarded in the company's laboratories. The evidence includes a video showing that a dog was unable to get up. An employee approached the dog, grabbed him by the skin on his back, and tried to have the dog stand up, but the dog collapsed.<sup>2</sup> According to the insiders, employees routinely picked up dogs in this manner. In a pair of videos captured via closed-captioned TV, an employee returned a dog to a kennel but carelessly shut the door on the dog's paw. The dog was left struggling with their paw trapped in the door. In the accompanying video, the plight of the dog was observed by an employee. Another employee climbed into the kennel, and together, after some effort, they were able to free the dog.<sup>3</sup> Two photos further illustrate the dog's ordeal: one captures the moment the dog's paw is trapped in the cage door, while the other reveals the resulting injury.<sup>4</sup>

## **II. Failure to maintain an adequate veterinary care program**

The Guide specifies that veterinary care is “an essential part of an animal care and use program,” which includes, among other things, effective management of “preventative medicine,” “protocol-associated disease, disability, or other sequelae,” “pain and distress,” “anesthesia and analgesia,” and “euthanasia.” In particular, the Guide advises that the attending veterinarian “should provide guidance to investigators and all personnel involved in the care and use of animals to ensure appropriate husbandry, handling, medical treatment, immobilization, sedation, analgesia, anesthesia, and euthanasia.”

The *Guide* emphasizes that studies likely to cause severe or chronic pain, or significantly impair an animal's ability to maintain normal physiological function or respond to stress, must include clearly defined humane endpoints or provide a science-based justification for omitting commonly accepted ones. It specifies that experiments involving the assessment of toxicologic effects should be governed by well-established humane endpoints.

However, the insiders' reports and evidence indicate that Palamur failed to maintain a program of adequate veterinary care.

### **A. Failure to adhere to currently accepted standards for ensuring welfare for dogs used in breeding**

Standard veterinary and animal welfare practices recommend limiting both the frequency and duration of breeding for female dogs to protect their health and well-being. For example, it's common to skip at least one heat cycle between litters to allow the dog to recover physically and hormonally. Also, older dogs—beyond 6 years of age—face increased risks of complications during pregnancy and delivery. However, Palamur jeopardized the health and well-being of female dogs used for breeding and their offspring by having female dogs give birth twice a year, and for more than the permitted five litters.

### **B. Failure to prevent injuries and provide adequate veterinary care for dogs**

Palamur failed to prevent injuries to dogs housed in crowded, barren conditions that led to stress-induced aggression and fighting. The dogs' ears became injured, bloodied, and

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<sup>2</sup> Please see the video at [this link](#).

<sup>3</sup> Please see the two videos at [this link](#).

<sup>4</sup> Please see the two photos at [this link](#).

even torn.<sup>5</sup> In one case, a dog sustained such severe bite wounds to the torso that sutures were required.<sup>6</sup> Despite serious injuries resulting from these altercations, the company neglected to provide necessary veterinary care, including wound cleaning and pain management.

#### **C. Failure to prevent infections in dogs administered test compounds**

Palamur failed to implement appropriate measures to prevent infections in dogs administered test compounds, leading to the development of severe and painful abscesses, typically on the dogs' necks or limbs,<sup>7</sup> but in at least one documented case, on the face.<sup>8</sup> These infections, likely caused by contaminated formulations or the compounds themselves, resulted in extensive tissue damage and open, pus-filled wounds that in some instances spread beyond the injection site. In one video, pus oozes from an untreated wound as the dog moans in pain—a stark illustration of the facility's disregard for even the most basic standards of veterinary care.<sup>9</sup>

#### **D. Lack of timely intervention to alleviate pain and distress**

In certain experiments at Palamur, animals were administered the maximum tolerated dose, just below the threshold that would cause death, resulting in significant adverse effects and extreme suffering. Two photos capture a dog lying in a pool of blood, while a third shows a dog in a bloodied kennel. A video depicts a dog squinting in pain, with froth at the mouth.<sup>10</sup> Given the severity of their distress, it is clear that these dogs' suffering should have been terminated.

#### **E. Use of inhumane euthanasia methods**

One of the insiders reported that Palamur uses the drug thiopentone to kill dogs without first sedating them—a failure that likely subjects the animals to unnecessary fear and distress. Similarly, when a Göttingen minipig at the facility accidentally became pregnant, her piglets were killed via intracardiac injection without prior sedation, in direct contravention of established standards for humane euthanasia.

### **III. Failure to provide safe housing for dogs and pigs**

Principle VII of the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training states: “The living conditions of animals should be appropriate for their species and contribute to their health and comfort.” The *Guide* expands on this point: “All animals should be housed under conditions that provide sufficient space as well as supplementary structures and resources required to meet physical, physiologic, and behavioral needs. Environments that fail to meet the animals' needs may result in abnormal brain development, physiologic dysfunction, and behavioral disorders ... that may compromise both animal well-being and scientific validity.”

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<sup>5</sup> Please see the eight photos at [this link](#).

<sup>6</sup> Please see the two photos at [this link](#).

<sup>7</sup> Please see the 30 photos at [this link](#).

<sup>8</sup> Please see the two photos at [this link](#).

<sup>9</sup> Please see the video at [this link](#).

<sup>10</sup> Please see photos and video at [this link](#).

However, the insiders reported that Palamur housed more beagles than the facility could accommodate, routinely confining three to four beagles in enclosures designed for only two. As previously noted, this overcrowding heightened stress levels among the animals, leading to frequent fights and resulting in serious injuries.

Additionally, one insider reported that pigs suffered injuries to their feet due to improper flooring in the animals' enclosures.

#### **IV. Failure to promote the psychological well-being of animals**

The *Guide* advises: "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 ... The primary aim of environmental enrichment is to enhance animal well-being by providing animals with sensory and motor stimulation, through structures and resources that facilitate the expression of species-typical behaviors and promote psychological well-being through physical exercise, manipulative activities, and cognitive challenges according to species-specific characteristics." It also emphasizes that social animals "should be housed in stable pairs or groups of compatible individuals."

However, the insiders report that Palamur failed to make any accommodations for the socialization and welfare of dogs and pigs confined at the facility. While the company has an on-paper policy that dogs and pigs should be provided with social enrichment and playtime, such measures are taken only when clients visit the facility. Otherwise, the animals don't get out of their cages except for the experiments.

One insider described a deeply troubling incident that underscores Palamur's failure to safeguard the psychological well-being of the animals in its care. Photographic evidence depicts a dog who consumed an excessive amount of food, resulting in a severely distended stomach and ultimately death. One image shows the stomach unnaturally swollen with undigested food, while another reveals the stomach surgically opened, exposing large quantities of barely chewed kibble. A final image captures food lodged in the dog's esophagus, further illustrating the extent of the animal's suffering.<sup>11</sup>

#### **V. Failure to ensure adherence to occupational health and safety measures**

The *Guide* directs institutions to ensure that veterinary medical staff "should implement procedures for evaluating the health and, if appropriate, the pathogen status of newly received animals, and the procedures should reflect acceptable veterinary medical practice" and "regulations applicable to zoonoses."

However, the insiders report that after Palamur captured 14 monkeys from a forest, two tested positive for the zoonotic disease monkeypox. The infected monkeys were killed, and the remaining 12—who initially tested negative—were only retested a week later, despite the virus's potentially longer incubation period. These 12 monkeys were then used in a client's

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<sup>11</sup> Please see photos at [this link](#).

study, even though any latent infection could have compromised the data and exposed personnel to the virus. Palamur reportedly took deliberate steps to conceal the incident: employees who may have had direct or indirect contact with the infected monkeys were not informed, nor was the broader community notified, placing both groups at potential risk.

**We urge you to investigate the concerns summarized in this letter and, if the claims are substantiated, to take swift and decisive action that includes rescinding Palamur's PHS-Approved Animal Welfare Assurance.**

If you have any questions, please contact me at [AlkaC@peta.org](mailto:AlkaC@peta.org). Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Alka Chandna". The signature is fluid and cursive, with the first name "Alka" being more prominent than the last name "Chandna".

Alka Chandna, Ph.D.  
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