



July 22, 2025

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Via e-mail: Alan.Singh@nhmrc.gov.au

Dear Mr. Singh:

Thank you for your March 17, 2025, response to PETA U.S. and PETA Australia's letter dated March 6, 2025,^{1,2} regarding a strangulation and traumatic brain injury (TBI) study conducted on rats at Monash University, which purportedly aimed to examine human health issues of intimate partner violence (IPV).³ Upon reviewing your reply, we're disappointed that the National Health and Medical Research Council (NHMRC) neither adequately addressed our specific scientific and ethical critiques of the study nor the organization's decision to fund it. While you cited various regulations and codes of practice, along with entities that enforce them, this does not equate to adequately addressing the public's concerns and may diminish confidence in the NHMRC's commitment to ethical research practices.

We are also disturbed to learn from Animal-Free Science Advocacy in Australia that despite the widespread criticism that Monash University and NHMRC received after the publication of this rat strangulation and TBI study,^{4,5} another faculty cohort at Monash conducted a subsequent cruel strangulation and TBI experiment on pregnant female rats and their juvenile offspring, including

¹Letter from Singh A at NHMRC to PETA U.S. and PETA Australia. Reply to PETA's request to end the funding for strangulation and TBI animal experiments. March 23, 2025. Accessed April 28, 2025. <https://www.peta.org/wp-content/uploads/2025/05/2025-03-17-response-to-letter-to-nhmrc-re-rat-strangulation-experiment.pdf>.

²Letter from PETA U.S. and PETA Australia to NHMRC. Request to end the funding for strangulation and TBI animal experiments. March 16, 2025. Accessed April 28, 2025. <https://www.peta.org/wp-content/uploads/2025/05/2025-03-06-letter-to-nhmrc-re-rat-strangulation-experiment.pdf>.

³Sun M, Symons GF, Spitz G, O'Brien WT, Baker TL, Fan J, Martins BD, Allen J, Giesler LP, Mychasiuk R, van Donkelaar P, Brand J, Christie B, O'Brien TJ, O'Sullivan MJ, Mitra B, Wellington C, McDonald SJ, Shultz SR. Pathophysiology, blood biomarkers, and functional deficits after intimate partner violence-related brain injury: Insights from emergency department patients and a new rat model. *Brain Behav Immun*. 2025; Jan 123:383-396. doi: [10.1016/j.bbi.2024.09.030](https://doi.org/10.1016/j.bbi.2024.09.030).

⁴Stock, P. 2025, February 14. Rats strangled in part government-funded Australian domestic violence study. *The Guardian*. Accessed February 13, 2025. <https://www.theguardian.com/world/2025/feb/14/rats-strangled-in-part-government-funded-australian-domestic-violence-study-ntwnfb>.

⁵PETA U.S. Rats Strangled to Near-Death in Gruesome Australian Domestic Violence Experiments. March 13, 2025. Accessed April 8, 2025. <https://www.peta.org/blog/rats-strangled-to-near-death/>.

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subjecting the offspring to a modified version of the widely discredited Forced Swim Test (FST). Alarming, the NHMRC once again funded this study.⁶

Based on the information presented below, we again urge NHMRC to prohibit funding for all strangulation and TBI experiments on animals, as well as the FST, and adopt a strategic plan to transition your funding initiatives towards modern and economically sound, non-animal research approaches.⁷ Joining our request is The Alliance for HOPE International (undersigned),⁸ a leading U.S. nonprofit that supports domestic violence survivors and has created the leading training and outreach organization in the world on the handling of fatal and non-fatal strangulation assaults, and we are now alerting our supporters via an action alert on this issue—PETA entities have more than 10.4 million members and supporters around the world.⁹

Scientific and Ethical Critiques Left Unaddressed by NHMRC

In your March 17, 2025, response to us, you wrote that NHMRC "does not fund research involving animals unless the work is of high quality as determined by NHMRC's peer review process... . Additionally, the NHMRC funding agreement requires NHMRC-funded research involving animals to comply with Commonwealth and state and territory legislation, the Australian code for the care and use of animals for scientific purposes (the Code) and relevant NHMRC policies, standards and guidelines."

The strangulation and TBI studies conducted at Monash University, which received funding from NHMRC, raise serious concerns about their scientific quality and potential non-compliance with Australian law.

Recent advancements in non-invasive technologies and computational models offer robust animal-free methods that can provide valuable insights without tormenting animals. As we mentioned in our March 6, 2025, letter to NHMRC, experts state that established biomarkers and advanced imaging technologies can detect brain injury and its progression in humans,^{10,11} making the replication of IPV injuries in experiments on rats financially wasteful and scientifically unsound.¹² Given the availability of viable, non-animal research methods we have mentioned, continuing to use animals in such experiments fails to meet the requirements of the

⁶Sgro M, Kodila Z, Salberg S, Li CN, Smith MJ, Freeman J, Vlassopoulos E, Harris S, Shultz SR, Yamakawa GR, Noel M, Mychasiuk R. Exposure to perinatal trauma modifies nociception and gene expression in the prefrontal cortex and hypothalamus of adolescent rats. *J Pain*. 2025; Mar 28:104762. doi: 10.1016/j.jpain.2024.104762.

⁷Research Modernization Now. 2025. Accessed February 26, 2025. <https://www.peta.org/wp-content/uploads/2025/01/Research-Modernization-NOW-Biomedical.pdf>.

⁸Alliance for HOPE International. (n.d.). Our history. Accessed July 8, 2025. <https://www.allianceforhope.org/about-us/history>.

⁹PETA. Aussie Experiments Strangle Rats in Domestic Violence Tests. Accessed July 21, 2025. <https://support.peta.org/page/85775/action/1>.

¹⁰Ghaith HS, Nawar AA, Gabra MD, Abdelrahman ME, Nafady MH, Bahbah EI, Ebada MA, Ashraf GM, Negida A, Barreto GE. A Literature Review of Traumatic Brain Injury Biomarkers. *Mol Neurobiol*. 2022; 59, 4141–4158. doi.org/10.1007/s12035-022-02822-6.

¹¹Popa LL, Chira D, Strilciuc Ș, Mureșanu DF (2023). Non-Invasive Systems Application in Traumatic Brain Injury Rehabilitation. *Brain Sci*. 2023; 13(11), 1594. doi.org/10.3390/brainsci13111594.

¹²Stock, P. 2025. Rats strangled in part government-funded Australian domestic violence study. *The Guardian*. February 14. Accessed February 13, 2025. <https://www.theguardian.com/world/2025/feb/14/rats-strangled-in-part-government-funded-australian-domestic-violence-study-ntwnfb>.

applicable legislation to which you claimed all NHMRC-funded research must adhere.¹³ We draw your particular attention to sub-cl 1.5(2) of the Code which states, in part, "*Evidence to support a case to use animals must demonstrate that: ... suitable alternatives to replace the use of animals to achieve the stated aims are not available*" (emphasis added).¹⁴

Furthermore, sub-cl 1.15 of the Code states, "*Projects that are not scientifically valid must not be performed, no matter how mild the impact on the wellbeing of the animals*" (emphasis added).¹⁵ In your March 17, 2025, response to us, you failed to address any of the scientific invalidities of Monash's rat strangulation and TBI experiment that we flagged—namely, significant differences between rat and human brain morphology, function, and structure;¹⁶ the inability to replicate in rats the psychological and social dimensions of trauma resulting from IPV in humans,^{17,18} and the fact that rats do not possess the same cognitive and emotional frameworks as humans to process and manifest trauma in comparable ways.¹⁹ This means that conclusions about human physiological and psychological trauma based on such experiments, including Monash's strangulation and TBI studies on rats, run a high risk of invalid clinical conclusions,^{20,21} and hence appear to again fail to meet the requirements of the Code and thus the legislation. Simply asserting that the applicable funding agreement mandates adherence to these provisions—without addressing our specific scientific concerns or providing supporting evidence—is inadequate. It offers no reassurance to us or the undersigned organizations that your institution intends to support only scientifically justified, human-relevant, and therefore legally defensible experiments in the future.

Additionally, sub-cl 1.5(4) of the Code states, "*Evidence to support a case to use animals must demonstrate that: ... the project involves the minimum adverse impact on the wellbeing of the animals involved*" (emphasis added).²² As pointed out in our March 6, 2025, letter to NHMRC, the force used in Monash's strangulation and TBI experiment likely caused significant distress and tissue trauma—given an average rat's size and the delicate anatomy of their respiratory

¹³*Prevention of Cruelty to Animals Act 1986* (Vic) ss 25-36, 42; *Prevention of Cruelty to Animals Regulations 2019* (Vic) reg 108. Accessed June 4, 2025.

https://content.legislation.vic.gov.au/sites/default/files/9cc60c2d-63c4-35b6-95ad-c39254a5d170_19-133sra%20authorised.pdf.

¹⁴National Health and Medical Research Council. 2013. Australian code for the care and use of animals for scientific purposes. Accessed February 18, 2025. <https://www.nhmrc.gov.au/about-us/publications/australian-code-care-and-use-animals-scientific-purposes>.

¹⁵NHMRC. 2013.

¹⁶*Neuron Development*. (n.d.). Human and rat brain comparisons. Accessed February 18, 2025. <https://neurondevelopment.org/human-rat-comparisons/>.

¹⁷Stock. 2025.

¹⁸Pisula W, Modlinska K. Animals in Search of Stimulation and Information: A Review of over 10 years of our Research on Spontaneous Exploration in Rats as a Response to Novelty in Low-Stress Paradigm. *Anim Behave Cogn*. 2023; 10 (4), 187-303. doi: 10.26451/abc.10.04.01.2023.

¹⁹Flandreau EI, Toth M. 2017. Animal Models of PTSD: A Critical Review. In: Vermetten, E., Baker, D.G., Risbrough, V.B. (eds) Behavioral Neurobiology of PTSD. *Current Topics in Behavioral Neurosciences*, vol 38. Springer, Cham. doi.org/10.1007/7854_2016_65.

²⁰Ihm VE. Two wrongs do make a right: Animal models. February 10, 2025. *LinkedIn*. Accessed February 14, 2025. <https://www.linkedin.com/pulse/two-wrongs-do-make-right-animal-models-ihmve/?trackingId=TbywK5fQ11Ak12aLu2IDPO%3D%3D>.

²¹Zhang KK, Matin R, Gorodetsky C, Ibrahim GM, Gouveia FV. Systematic review of rodent studies of deep brain stimulation for the treatment of neurological, developmental and neuropsychiatric disorders. *Transl Psychiatry*. 2024 Apr 11;14(1):186. doi: 10.1038/s41398-023-02727-5.

²²NHMRC. 2013.

system—as some animals had to be resuscitated after the procedure.^{23,24,25} Furthermore, Dr. Andrew Knight, a veterinary professor of animal welfare,²⁶ determined that Monash experimenters did not administer adequate analgesia to the rats before these painful procedures,²⁷ which have now been implemented and funded twice. Adding to that, Dr. Katherin Hermann, a veterinarian, an expert in animal welfare and ethics, and a former regulator responsible for assessing animal research proposals and granting licenses in Germany,²⁸ condemned Monash's experiment, saying that she "would not have approved" this research since it inflicted "severe and needless" suffering in rats.²⁹ It's therefore reasonable to conclude that Monash's rat strangulation and TBI experiment did not involve the *minimum adverse impact* on the animals used, and it seems highly unlikely that any evidence provided would have adequately demonstrated that it did, which casts further doubt on compliance with the requirements of the Code and therefore the legislation.

New Rat Strangulation and TBI Experiment at Monash

It appears that another Monash faculty cohort used the same problematic analgesia regimen to conduct a similarly cruel experiment on pregnant female rats and their juvenile offspring.³⁰ Most of the scientific and ethical objections that we described above regarding the initial experiment also apply to the more recent experiment.^{31,32,33} As if that were not enough, using the modified FST in the more recent publication is also problematic.³⁴ Once thought of as a proxy measure of despair-like behaviors in animals, FST is widely seen as based on a flawed observation that antidepressants can extend swimming time in rodents (despite many false positives and negative outcomes).³⁵ Today, scientific literature suggests that behaviors observed during FST may be representative of an evolutionary adaptation to stress and should not be used to assess mood.³⁶

Numerous pharmaceutical companies, academic institutions and government entities around the world—including La Trobe University (June 2024), the Australian Research Council (January 2024), the Parliament of New South Wales (March 2024), University of Western Australia (December 2023), Macquarie University (September 2022), University of South Australia (April 2021), and University of Adelaide (September 2020)—have already stopped using or supporting others that use this increasingly obsolete and positively cruel behavioral test.³⁷ NHMRC itself aligned with this stance in December 2023, its own policy stating that "*NHMRC considers the*

²³Sun et al. 2025.

²⁴*Ibid.*

²⁵Ihm. 2025.

²⁶Knight A. Andrew Knight [LinkedIn page]. *LinkedIn*. Accessed February 21, 2025.

<https://www.linkedin.com/in/andrew-knight-409b7434/?originalSubdomain=uk>.

²⁷Stock. 2025.

²⁸*Johns Hopkins Bloomberg School of Public Health*. Hermann K – Faculty profile. Accessed February 19, 2025.

<https://publichealth.jhu.edu/faculty/3518/kathrin-herrmann>.

²⁹Stock. 2025.

³⁰Sgro et al. 2025.

³¹Sun et al. 2025.

³²Sun et al. 2025.

³³Srgo et al. 2025.

³⁴*Ibid.*

³⁵Trunnell ER, Carvalho C. The forced swim test has poor accuracy for identifying novel antidepressants. *Drug Discov Today*. 2021 Dec;26(12):2898-2904. doi: 10.1016/j.drudis.2021.08.003.

³⁶Molendijk ML, de Kloet ER. Immobility in the forced swim test is adaptive and does not reflect depression. *PNEC*. 2015; 62:389-391. doi:10.1016/j.psyneuen.2015.08.028.

³⁷PETA. Victories! PETA is ending near-drowning experiments on animals. Accessed April 15, 2025.

<https://www.peta.org/features/peta-ends-near-drowning-tests-small-animals/>.

potential adverse impacts of the forced swim test on animal wellbeing to be significant. When the scientific validity of this procedure for the proposed research is not supported by robust evidence, the use of the forced swim test in rodents cannot be justified in accordance with the Australian code for the care and use of animals for scientific purposes and must not proceed" (emphasis added).³⁸ Your response to us purported to provide assurances that NHMRC's funding agreement requires that all research it funds complies with the Code. NHMRC's own policy states that robust evidence must exist to support the scientific validity of its use under that Code. As outlined above, that evidence does not appear to exist here and the experiment was insupportable. Yet the funding continues to flow.

No Excuse for Continuing to Replicate Violent Criminal Acts in Animal Models

Given that Monash is now conducting a "larger human study investigating whether a non-invasive blood test can identify concussion and strangulation in intimate partner violence survivors,"³⁹ now is the time to commit to never again funding experiments on animals that replicate violent criminal acts (e.g., strangulation and TBI), nor continuing to fund the widely condemned FST. There is no scientific, ethical, or legal justification for continuing to harm animals in IPV experiments, especially given the availability of animal-free, human-relevant research tools.

Furthermore, there is a growing shift abroad away from animal experimentation and toward superior animal-free research, and we encourage NHMRC to emulate this embrace of human-relevant science:

- The US Food and Drug Administration announced on April 10, 2025, a "groundbreaking step to advance public health by replacing animal testing in the development of monoclonal antibody therapies and other drugs with more effective, human-relevant methods," in an effort to "improve drug safety and accelerate the evaluation process, while reducing animal experimentation, lowering research and development (R&D) costs, and ultimately, drug prices."⁴⁰
- The US National Institutes of Health (NIH) announced a major new initiative on April 29, 2025, "to expand innovative, human-based science while reducing animal use in research."⁴¹

You may contact me directly via e-mail at MaggieW@peta.org. We urge you to take swift action to resolve this troubling matter, and we look forward to your response.

³⁸NHMRC. Statement on forced swim test rodent models. December 13, 2023. Accessed April 14, 2025. <https://www.nhmrc.gov.au/research-policy/ethics/statement-forced-swim-test-rodent-models>.

³⁹E-mail from Jane MS at Monash University to PETA U.S. and PETA Australia to Monash University. Reply to PETA's request to end the funding for strangulation and TBI animal experiments. March 23, 2025. Accessed April 28, 2025. <https://www.peta.org/wp-content/uploads/2025/05/2025-04-02-monash-responded-to-letter-re-rat-strangulation.pdf>.

⁴⁰U.S. Food and Drug Administration. FDA announces plan to phase out animal testing requirement for monoclonal antibodies and other drugs. April 10, 2025. Accessed May 13, 2025. <https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-monoclonal-antibodies-and-other-drugs>.

⁴¹National Institutes of Health. NIH to prioritize human-based Research Technologies. April 29, 2025. Accessed May 27, 2025. <https://www.nih.gov/nih-prioritize-human-based-research-technologies>.

Sincerely,



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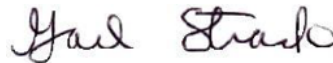
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