



PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

July 22, 2025

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Via e-mail: [Trevor.Pisciotta@deeca.vic.gov.au](mailto:Trevor.Pisciotta@deeca.vic.gov.au)

Dear Dr Pisciotta,

Thank you for your April 1, 2025,<sup>1</sup> response to PETA U.S. and PETA Australia's letter dated March 6, 2025,<sup>2</sup> regarding a strangulation and traumatic brain injury (TBI) experiment on rats at Monash University that purportedly attempted to examine human health issues of intimate partner violence (IPV).<sup>3</sup> We look forward to learning the result of Animal Welfare Victoria's investigation into our concerns.

We're also disturbed to learn from Animal-Free Science Advocacy in Australia that despite the widespread criticism that Monash University received after the publication of this rat strangulation and TBI experiment another faculty cohort at Monash conducted a subsequent cruel strangulation and TBI experiment on pregnant female rats and their juvenile offspring,<sup>4,5,6</sup> including subjecting them to a modified version of the widely discredited Forced Swim Test (FST).

<sup>1</sup> Letter from Department of Energy, Environment and Climate Action and Animal Welfare Victoria to PETA U.S. and PETA Australia. Response regarding request to investigate strangulation and TBI animal experiments. April 1, 2025. Accessed July 8, 2025. <https://www.peta.org/wp-content/uploads/2025/07/2025-04-01-response-from-minag-deeca.pdf>.

<sup>2</sup> Letter from PETA U.S. and PETA Australia to Minister of Agriculture and Animal Welfare Victoria. Request to investigate strangulation and TBI animal experiments. March 6, 2025. Accessed April 23, 2025. <https://www.peta.org/wp-content/uploads/2025/03/2025-03-06-letter-to-minister-for-agriculture-RSPCA-re-rat-strangulation-experiment.pdf>.

<sup>3</sup> Sun 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).

<sup>4</sup> Stock, 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>.

<sup>5</sup> PETA 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/>.

<sup>6</sup> Sgro 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](https://doi.org/10.1016/j.jpain.2024.104762).

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**Based on the information presented below, we ask that you please expand your investigation into potential violations of the applicable provisions of the *Prevention of Cruelty to Animals Act 1986* (Vic) ("the Act"), on the basis that the relevant parties have failed to meet the requisite conditions and standards specified in the National Health and Medical Research Council's (NHMRC) *Australian Code for the Care and Use of Animals for Scientific Purposes 2013* (8<sup>th</sup> ed) ("the Code"),<sup>7</sup> and in turn the *Prevention of Cruelty to Animals Regulations 2019* (Vic).<sup>8</sup> We ask that you include, if warranted, any additional penalties against experimenters in the initial study we flagged and any new penalties applicable to those in the most recent experiment. Joining our request is The Alliance for HOPE International (undersigned),<sup>9</sup> 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.<sup>10</sup>**

### **Scientific and Ethical Critiques Left Unaddressed by Monash**

In Monash's March 23, 2025, response to us, the university wrote that "the use of any animal is a necessity" for examining health effects of IPV due to "the complexity and sensitivity of investigating intimate partner violence in a clinical setting, and the inability to analyse brain tissue in living human patients ..."<sup>11</sup> This is incorrect, as 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 7, 2025, letter to Monash,<sup>12</sup> experts state that established biomarkers and advanced imaging technologies can detect brain injury and its progression in humans,<sup>13,14</sup> making the replication of IPV injuries in experiments on rats—as Monash did in both strangulation and TBI experiments we cited—

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<sup>7</sup> NHMRC. 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>.

<sup>8</sup> Prevention of Cruelty to Animals Regulations 2019 (Vic). S.R. No. 133/2019. Available at: [https://content.legislation.vic.gov.au/sites/default/files/9cc60c2d-63c4-35b6-95ad-c39254a5d170\\_19-133sra%20authorised.pdf](https://content.legislation.vic.gov.au/sites/default/files/9cc60c2d-63c4-35b6-95ad-c39254a5d170_19-133sra%20authorised.pdf).

<sup>9</sup> Alliance for HOPE International. (n.d.). Our history. Accessed July 8, 2025. <https://www.allianceforhope.org/about-us/history>.

<sup>10</sup> PETA. Aussie Experiments Strangle Rats in Domestic Violence Tests. Accessed July 21, 2025. <https://support.peta.org/page/85775/action/1>.

<sup>11</sup> E-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 May 13, 2025. <https://www.peta.org/wp-content/uploads/2025/05/2025-04-02-monash-responded-to-letter-re-rat-strangulation.pdf>.

<sup>12</sup> PETA. Letter to Monash University Regarding Rat Strangulation Experiment. March 6, 2025. Accessed May 13, 2025. <https://www.peta.org/wp-content/uploads/2025/03/2025-03-06-letter-to-monash-uni-re-rat-strangulation-experiment.pdf>.

<sup>13</sup> Ghaith 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](https://doi.org/10.1007/s12035-022-02822-6).

<sup>14</sup> Popa 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](https://doi.org/10.3390/brainsci13111594).

economically wasteful and scientifically unsound.<sup>15,16,17</sup> Given the availability of viable, non-animal research methods we have mentioned, continuing to use animals in such experiments arguably constitutes a failure to meet the requirements of the Code and therefore a breach of the legislation. Specifically, reg 108 of the Regulations requires animal experimenters to abide by the Code,<sup>18</sup> and sub-cl 1.5(2) of the Code 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).<sup>19</sup>

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).<sup>20</sup> In Monash's March 23, 2025, response to us, the university failed to address any of the scientific invalidities of its rat strangulation and TBI experiment that we flagged—namely, significant differences between rat and human brain morphology, function, and structure;<sup>21</sup> the inability to replicate in rats the psychological and social dimensions of trauma resulting from IPV in humans;<sup>22,23</sup> and, the fact that rats do not possess the same cognitive and emotional frameworks as humans to process and manifest trauma in comparable ways.<sup>24</sup> This means that conclusions about human physiological and psychological trauma based on such experiments on animals, including Monash's strangulation and TBI experiment on rats, run a high risk of invalid clinical conclusions,<sup>25,26</sup> and hence appear to again fail to meet the requirements of the Code and thus the Regulations and in turn the Act. Monash simply states that it adheres to these provisions but has provided no evidence to counter our specific scientific critiques, and therefore in our view there is no current evidence of compliance with the above legislative requirements.

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).<sup>27</sup> As pointed out in our March 7, 2025, letter to Monash, the force used in the university's strangulation and TBI experiment likely caused significant

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<sup>15</sup> Sun et al. 2025.

<sup>16</sup> Sgro et al. 2025.

<sup>17</sup> Stock, 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>.

<sup>18</sup> Prevention of Cruelty to Animals Regulations 2019.

<sup>19</sup> NHMRC. 2013.

<sup>20</sup> NHMRC. 2013.

<sup>21</sup> Neuron Development. (n.d.). Human and rat brain comparisons. Accessed February 18, 2025. <https://neurondevelopment.org/human-rat-comparisons/>.

<sup>22</sup> Stock. 2025.

<sup>23</sup> Pisula 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.

<sup>24</sup> Flandreau 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.

<sup>25</sup> Ihm 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=TbywK5fQl1Ak12aLu2IDPO%3D%3D>.

<sup>26</sup> Zhang 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.

<sup>27</sup> NHMRC. 2013.

distress and tissue trauma—given an average rat’s size and the delicate anatomy of their respiratory system—as some animals had to be resuscitated after the procedure.<sup>28,29</sup> Furthermore, Dr. Andrew Knight, a veterinary professor of animal welfare,<sup>30</sup> determined that Monash experimenters did not administer adequate analgesia to the rats before these painful procedures.<sup>31</sup> Adding to that, Dr. Katherin Hermann,<sup>32</sup> a former regulator responsible for assessing animal research proposals and granting licenses in Germany, condemned Monash’s experiment, saying that she “would not have approved” this research since it inflicted “severe and needless” suffering in rats.<sup>33</sup> 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 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. All of the scientific and ethical objections that we described previously regarding the initial experiment also apply to the more recent experiment.<sup>34,35</sup> As if that were not enough, subjecting rats to a modified FST in the more recent publication provides additional evidence that the requirements of sub-cls 1.15 and 1.5(4) of the Code were likely not met due to a lack of robust scientific validity and significant adverse impacts on animal well-being, respectively.<sup>36</sup> 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).<sup>37</sup> 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.<sup>38</sup>

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), NHMRC (December 2023), 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.<sup>39</sup> The NHMRC—a funding body for the initial and more recent strangulation and

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<sup>28</sup> Sun et al. 2025.

<sup>29</sup> Ihm. 2025.

<sup>30</sup> Knight A. Andrew Knight [LinkedIn page]. LinkedIn. Accessed February 21, 2025.  
<https://www.linkedin.com/in/andrew-knight-409b7434/?originalSubdomain=uk>.

<sup>31</sup> Stock. 2025

<sup>32</sup> Johns Hopkins Bloomberg School of Public Health. Herrmann K – Faculty profile. Accessed February 19, 2025.  
<https://publichealth.jhu.edu/faculty/3518/kathrin-herrmann>.

<sup>33</sup> Stock. 2025.

<sup>34</sup> Sun et al. 2025.

<sup>35</sup> Srgo et al. 2025.

<sup>36</sup> *Ibd.*

<sup>37</sup> Trunnell 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.

<sup>38</sup> Molendijk 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.

<sup>39</sup> PETA. Victory! PETA is ending near-drowning experiments on animals. Accessed April 15, 2025.  
<https://www.peta.org/features/peta-ends-near-drowning-tests-small-animals/>.

TBI experiments at Monash—states, "*NHMRC considers the 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).<sup>40</sup>

### **Continuing to Replicate Violent Criminal Acts in Animal Models Highlights Need for Oversight and Accountability**

Monash's strangulation and TBI experiments on rats raise serious concerns regarding the university's arguable failure to adhere to the Regulations and the Code, resulting in significant animal suffering. Furthermore, by perpetuating the use of outdated models, experimenters divert resources away from more human-relevant approaches and detract from essential questions that can better help the victims of domestic abuse.<sup>41</sup> Indeed, a growing shift away from animal experimentation and toward superior animal-free research is currently underway abroad, further making Monash's decision to continue using animals for such wasteful experimentation an outlier:

- 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".<sup>42</sup>
- 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".<sup>43</sup>

It is with these considerations in mind that we ask Animal Welfare Victoria to expand its investigation to include the information we have presented in this letter, and, if warranted, pursue charges against the experimenters responsible for violations under the Act.

You may contact me directly via e-mail at [SamuelP@peta.org](mailto:SamuelP@peta.org). Thank you for your attention to this important matter, and we look forward to your response.

Sincerely,



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<sup>40</sup> NHMRC. 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>.

<sup>41</sup> Ihm. 2025.

<sup>42</sup> U.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>.

<sup>43</sup> National Institutes of Health. NIH to prioritize human-based research technologies. April 29, 2025. Accessed May 13, 2025. <https://www.nih.gov/nih-prioritize-human-based-research-technologies>.



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