

June 5, 2025

The Honorable Admiral Kevin E. Lunday  
Acting Commandant  
U.S. Coast Guard

Dear Acting Commandant Lunday:

Thank you in advance for your time and your service to our country. I am writing to you on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters worldwide—regarding the recent disturbing reinstatement by the U.S. Coast Guard (USCG) of deadly trauma training drills on live animals, known as “live tissue training” (LTT), during which live pigs and goats are stabbed, shot, dismembered, and killed. Importantly, President Donald J. Trump’s first administration had rightly banned LTT in 2017, with widespread bipartisan support in Congress, following a major Obama-era exposé by, and discussions with, PETA.<sup>1,2</sup> Given the first Trump administration’s banning of LTT in the USCG, it is perplexing (and perhaps a simple oversight error) that this abusive and wasteful practice is now being greenlit by the current Trump administration. **Based on the information presented below, we urge you to rectify this situation and permanently ban the USCG’s use of animals in LTT.**

### **USCG is Now Again Permitting the Use of Animals in LTT**

The USCG recently issued Commandant Instruction 6320.9 (COMDTINST 6320.9) titled “Emergency Medical Services (EMS),” which is dated April 22, 2025, but was posted publicly apparently for the first time on June 2, 2025. Section 15.f.. of COMDTINST 6320.9 states, “*Live Tissue Training (LTT). TCCC-CMC level (or equivalent) practitioners are permitted to attend a DoD or DHS sanctioned LTT as part of mission or deployment preparation.*”<sup>3</sup>

TCCC refers to “Tactical Combat Casualty Care” and CMC refers to “Combat Medic/Corpsman.” Regarding “TCCC-Combat Medic/Corpsman (CMC),” Section 14.b.(3) of COMDTINST 6320.9 states, “This Tier 3 scope of practice provides more advanced prehospital casualty care for military medical personnel such as combat medics, corpsmen, and pararescue personnel. This course is designed for those deployed in combat or contingency operations and who need advanced prehospital casualty care skills. Instruction includes the utilization of

<sup>1</sup> U.S. Coast Guard. Memorandum from Brown MK regarding a 2012 investigation into live tissue training by U.S. Coast Guard. May 1, 2013. Accessed June 4, 2025.

[https://media.defense.gov/2017/Oct/05/2001823275/-1/-1/0/DCMS\\_LTT\\_FAM\\_FINAL.PDF](https://media.defense.gov/2017/Oct/05/2001823275/-1/-1/0/DCMS_LTT_FAM_FINAL.PDF).

<sup>2</sup> PETA. Victory! U.S. Coast Guard Ends Use of Animals in Trauma Training. (n.d.). March 20, 2018. Accessed June 4, 2025. <https://www.peta.org/blog/coast-guard-commandant-congress-ending-animal-use-right-thing>.

<sup>3</sup> U.S. Coast Guard. Emergency Medical Services (EMS), COMDTINST 6320.9. (n.d.). April 22, 2025. Accessed June 4, 2025. [https://media.defense.gov/2025/Jun/02/2003730417/-1/-1/0/CI\\_6320\\_9.PDF](https://media.defense.gov/2025/Jun/02/2003730417/-1/-1/0/CI_6320_9.PDF).

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advanced medical equipment and the application of knowledge in managing life-threatening injuries commonly encountered in combat.”<sup>4</sup> This new permission allowing USCG servicemembers to participate in LTT drills that use animals is a reversal of the USCG’s banning of LTT in 2017 under the first Trump administration, and we urge you to immediately reinstate the ban on this practice.

### **USCG Had Banned the Use of Animals in LTT in 2017 Under First Trump Administration**

In 2012, PETA released a whistleblower video of a USCG medical training course in which instructors repeatedly cracked and cut off the limbs of live goats with tree trimmers, stabbed the animals with scalpels to cause internal injuries, and cut into their abdomens to pull out their organs.<sup>5</sup> According to the whistleblower, goats were also shot in the face with pistols and hacked apart with an ax while still alive. Some of the animals moaned loudly and kicked during the mutilations. The disturbing video and the resulting public and congressional outcry that followed, along with USCG’s discussions with PETA, led to USCG banning LTT in 2017.

In 2017, the U.S. Defense Health Agency criticized the use of animals in military trauma drills as being “outdated and cost-prohibitive”<sup>6</sup> and “not anatomically accurate.”<sup>7</sup> In 2017, during President Trump’s first term in office, then-USCG Commandant Admiral Paul Zukunft told the U.S. Congress that the use of animals for trauma training is “abhorrent” and that the Coast Guard “will move to a simulation [training model] . . . For us it will be the right thing to do to prepare our Coast Guard members who may be deployed to theaters where they may encounter traumatic injuries.”<sup>8</sup> As such, the Coast Guard became the first branch of the U.S. military to end the use of animals for trauma training altogether,<sup>9</sup> and the USCG’s then-Assistant Commandant for Capability RMDL Mike Ryan wrote to a ranking member of Congress that the USCG “announced the end of live-tissue training to all Coast Guard personnel on 28 June 2017.”<sup>10</sup> In 2018, RMDL Ryan confirmed to PETA again that, “The Coast Guard continues to prohibit live tissue training as announced on 28 June 2017.”<sup>11</sup> As such, we were proud to recognize the USCG

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<sup>4</sup> U.S. Coast Guard. 2025.

<sup>5</sup> PETA. Video: Goats Hacked Apart in Military Training. April 18, 2012. Accessed June 4, 2025.

<https://www.peta.org/blog/leaked-video-shows-goats-hacked-apart-military-training/>.

<sup>6</sup> Defense Health Agency. 2016 Stakeholder Report. (n.d.). Accessed June 4, 2025. <https://health.mil/Reference-Center/Reports/2017/06/08/Defense-Health-Agency-2016-Stakeholder-Report>

<sup>7</sup> DHA. Defense Health Agency SBIR/STTR programs. (n.d.). May 16, 2017. *Seed Funding Health Technologies*. Accessed June 4, 2025. <https://www.peta.org/wp-content/uploads/2025/06/Master-Health-Technologies.National-SBIR.pdf>.

<sup>8</sup> Seck HH. *Ending “abhorrent” live tissue training was right: Coast Guard*. May 18, 2017. Military.com. Accessed June 4, 2025. <http://www.military.com/daily-news/2017/05/18/ending-abhorrent-live-tissue-training-was-right-coast-guard.html>.

<sup>9</sup> Seck HH. *Coast Guard puts permanent end to wounding animals for training*. March 2018. Military.com. Accessed June 4, 2025. <https://www.military.com/daily-news/2018/03/20/coast-guard-puts-permanent-end-wounding-animals-training.html>.

<sup>10</sup> U.S. Coast Guard. Letter from Ryan MP to Roybal-Allard L regarding the U.S. Coast Guard’s reexamination of the use of live animals for live tissue training. October 30, 2017. Accessed June 4, 2025. <https://www.peta.org/wp-content/uploads/2018/03/USCGLetterConfirmingEndtoLTT10-30-17.pdf>.

<sup>11</sup> PETA. Email from Gala S to Ryan M regarding the U.S. Coast Guard’s decision about the use of live animals in live tissue training. July 27, 2018.. Accessed June 4, 2025. <https://www.peta.org/wp-content/uploads/2025/06/2018-07-27-emial-gala-s-ryan-re-ending-viv-in-live-tissue-training-.pdf>.

under the first Trump administration as our first-ever “Agency of the Year” in 2018.<sup>12</sup>

### **Studies Show Animal-Free Training Methods Can Effectively Teach Medical Providers**

There is no scientific, ethical, or legal justification for yet again harming and killing animals in USCG LTT drills, given that this practice has been prohibited in the USCG since 2017. The medical literature is clear about the superiority of non-animal training methods. For example, a 2021 study conducted by Brooke Army Medical Center’s U.S. Army Institute of Surgical Research, among others, compared the performance in scenarios between a synthetic trainer and live tissue models. Researchers concluded that “objective performances were similar among both animal and simulation labs. Task completion times were quicker with simulation model.”<sup>13</sup> Furthermore, a 2018 study stated, “A close examination of the evidence base for the presumed advantages of LTT showed that it is not superior to simulation-based methods in terms of educational benefit. Since credible alternatives that do not cause harm to animals are available, we conclude that LTT on animal models is ethically unjustified.”<sup>14</sup>

### **Request for USCG to Permanently Reinstate its Ban on the Use of Animals in LTT**

PETA’s scientific team is eager to collaborate with USCG to help you to identify validated, non-animal technologies—such as high-fidelity human-patient simulators that can bleed and breathe, hyper-realistic “Cut Suits,” and other methods—that can deliver high-quality training on accurate human anatomy and physiology and save animals’ lives. By prohibiting LTT, the USCG can enhance training for its servicemembers, prevent needless animal suffering, and end waste of government funds.

This is not a choice between saving humans and saving other animals. Instead, we advocate switching to more modern and effective training tools to better train surgeons, medics, and first responders to save lives. **Based on this information, we ask that you please amend COMDTINST 6320.9 to explicitly prohibit the use of animals in LTT.**

Thank you for considering this important issue; I look forward to your response.

Very respectfully,



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<sup>12</sup> PETA. U.S. Coast Guard named PETA’s 2023 Agency of the Year. (n.d.). March 30, 2023. Accessed June 4, 2025. <https://www.peta.org/blog/us-coast-guard-agency-of-the-year/>.

<sup>13</sup> Mu T et al. Simulation versus live tissue training randomised trial for ECMO proficiency: Is one better than the other?. *BMJ Simul Technol Enhanc Learn.* 2020;7(4):223-229. Accessed June 4, 2025. [doi:10.1136/bmjstel-2020-000682](https://doi.org/10.1136/bmjstel-2020-000682).

<sup>14</sup> Rubeis G, Steger F. Is live-tissue training ethically justified? An evidence-based ethical analysis. *Altern Lab Anim.* 2018;46(2):65-71. Accessed June 4, 2025. [doi:10.1177/026119291804600206](https://doi.org/10.1177/026119291804600206).