



July 24, 2023

Robert O'Keefe
Acting President
Health Effects Institute

Via e-mail: rokeefe@healtheffects.org

Dear Mr. O'Keefe,

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals U.S.—PETA entities have more than 9 million members and supporters globally. **Based on the information presented below, we ask that you please restrict Health Effects Institute's (HEI) research to animal-free studies, as General Motors,¹ Ford Motor Company,² Stellantis and others in the automotive industry³ have already done after discussions with PETA.**

HEI has been conducting and funding cruel and deadly tests on animals for decades. Below are a few recent examples for your reference:

- Experimenters repeatedly forced mice to inhale a known carcinogen, punctured their hearts, and killed and dissected them.⁴
- Experimenters repeatedly force-fed mice acrylonitrile (a toxic but common industrial chemical), took their blood, and killed and dissected them.⁵
- Experimenters exposed mice to a high concentration of ozone which causes airway inflammation, injected them with a drug that blocks spontaneous breathing, intubated them and pumped their lungs with air, and killed and dissected them.⁶

¹ PETA. PETA's big impact! Inside the campaign to end car-crash tests on animals. July 12, 2023. Accessed July 24, 2023. <https://www.peta.org/blog/history-car-crash-tests-animals/>

² PETA. Victory! Ford officially shifts gears on animal testing. July 11, 2023. Accessed July 24, 2023. <https://www.peta.org/blog/ford-animal-testing/>

³ PETA. The automotive industry's stance on animal testing. n.d. Accessed July 24, 2023. <https://www.peta.org/misc/automotive-industry-animal-testing/>

⁴ Nellis M, Caperton CO, Liu K, et al. Lung metabolome of 1,3-butadiene exposed Collaborative Cross mice reflects metabolic phenotype of human lung cancer. *Toxicology*. 2021;463:152987. doi:10.1016/j.tox.2021.152987

⁵ Walker VE, Walker DM, Ghanayem BI, Douglas GR. Analysis of Biomarkers of DNA Damage and Mutagenicity in Mice Exposed to Acrylonitrile. *Chem Res Toxicol*. 2020;33(7):1623-1632. doi:10.1021/acs.chemrestox.0c00154

⁶ Birukova A, Cyphert-Daly J, Cumming RI, et al. Sex Modifies Acute Ozone-Mediated Airway Physiologic Responses. *Toxicol Sci*. 2019;169(2):499-510. doi:10.1093/toxsci/kfz056

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 cut off mice’s nerves, intubated them and pumped them with a substance that manipulates lung functions, and killed and dissected them.⁷
- Experimenters repeatedly injected guinea pigs with a substance that worsens inflammation, exposed them to a high concentration of ozone to induce airway inflammation, cut them open and inserted tubes and wires into their chests, took their blood, and killed and dissected them.⁸

In addition to the cruelty, these tests on animals are unnecessary because there are many other animal-free methods that can be used, such as *in vitro* tests, organoids, organs-on-a-chip, computer modeling, medical imaging, human clinical research, and more. HEI does indeed conduct and fund many of those types of studies, and we appreciate it. We ask that, going forward, HEI move to *exclusively* conduct, fund, and commission studies using animal-free methods.

There has been a sea change in recent years in moving away from animal tests. The Environmental Protection Agency, which collaborates heavily with HEI, announced in 2019 that it will completely eliminate studies on mammals that the agency conducts and funds by 2035.⁹ The European Parliament passed a resolution in 2021, calling on the European Commission to create an action plan to end experiments on animals.¹⁰ In 2022, the FDA Modernization Act 2.0 passed in the U.S. and lifted the requirements of animal testing for new biologics.¹¹ Subsequently in January 2023, the European Citizens Initiative “Save Cruelty-Free Cosmetics—Commit to a Europe without animal testing,” which calls on the European Commission to end *all* animal testing, has received 1.2 million validated signatures.¹² The U.S.-based National Medical Association¹³ and the National Hispanic Medical Association¹⁴ have also both recently adopted groundbreaking new public policies against animal testing, signaling a significant shift on this issue in the scientific community. In every single advancement mentioned above, PETA

⁷ Drake MG, Scott GD, Blum ED, et al. Eosinophils increase airway sensory nerve density in mice and in human asthma. *Sci Transl Med*. 2018;10(457):aar8477. doi:10.1126/scitranslmed.aar8477

⁸ Wicher SA, Jacoby DB, Fryer AD. Newly divided eosinophils limit ozone-induced airway hyperreactivity in nonsensitized guinea pigs. *Am J Physiol Lung Cell Mol Physiol*. 2017;312(6):L969-L982. doi:10.1152/ajplung.00530.2016

⁹ EPA Press Office. Administrator Wheeler signs memo to reduce animal testing, awards \$4.25 million to advance research on alternative methods to animal testing. September 10, 2019. Accessed July 24, 2023.

<https://www.epa.gov/newsreleases/administrator-wheeler-signs-memo-reduce-animal-testing-awards-425-million-advance>

¹⁰ European Parliament. MEPs demand EU action plan to end the use of animals in research and testing. September 16, 2021. Accessed July 24, 2023. <https://www.europarl.europa.eu/news/en/press-room/20210910IPR11926/meps-demand-eu-action-plan-to-end-the-use-of-animals-in-research-and-testing>

¹¹ Hernandez J. The FDA no longer requires all drugs to be tested on animals before human trials. *National Public Radio*. January 12, 2023. Accessed July 24, 2023. <https://www.npr.org/2023/01/12/1148529799/fda-animal-testing-pharmaceuticals-drug-development>

¹² Culliney K. ‘Voice of the citizens’: European Citizens’ Initiative to protect animal testing ban hits 1.2 million votes. *CosmeticsDesign-Europe*. January 27, 2023. Accessed July 24, 2023. <https://www.cosmeticsdesign-europe.com/Article/2023/01/27/European-Citizens-Initiative-for-cruelty-free-cosmetics-hits-1.2-million-votes-and-will-reach-European-Commission>

¹³ National Medical Association. NMA statement on animal testing. April 5, 2022. Accessed July 24, 2023. <https://www.nmanet.org/news/604379/NMA-Statement-on-Animal-Testing.htm>

¹⁴ National Hispanic Medical Association. NHMA statement on PETA's Research Modernization Deal. January 20, 2022. Accessed July 24, 2023. <https://www.nhmamd.org/nhma-policy-statements>

scientists played a major role, and we have created a roadmap for ending animal testing called The Research Modernization Deal,¹⁵ for your reference.

May I please hear from you by August 24, 2023 regarding this socially important matter? You can contact me by e-mail at FrancesC@peta.org. Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Frances Cheng'.

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

¹⁵ PETA. The Research Modernization Deal. Updated January 2023. Accessed July 24, 2023.
<https://www.peta.org/wp-content/uploads/2023/01/peta-research-modernization-deal.pdf>