



November 4, 2025

Rhea F. Law
President

c/o Linda De Blasio, Senior Special Assistant to the President
University of South Florida

Via e-mail: rhealaw@usf.edu; president@usf.edu; ldeblasio@usf.edu

Dear President Law:

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 10.4 million members and supporters globally—to follow up on our July 20, 2023, letter regarding the use of animals in decompression sickness/illness (DCS/DCI) and oxygen-toxicity experiments.¹ **Given scientific and ethical concerns regarding these experiments that we previously detailed, and the new information presented below, we urge the University of South Florida (USF) to prohibit DCS/DCI and oxygen-toxicity experiments on animals, in favor of superior human-relevant research methods.**

Records Confirm Animal Use for DCS/DCI Experiments at USF

According to public records obtained by PETA from the U.S. Navy, USF experimenter Jay Dean is conducting invasive, painful, and/or deadly procedures using rats in his protocol, titled, “Mitigation of CNS Oxygen Toxicity: Mitochondria Targeted Anti-Oxidant Therapy and Aquaporin Gas Channels,”² which was approved by the USF Institutional Animal Care and Use Committee (IACUC) through December 6, 2025.³ Dean’s experiments on rats have received \$1,004,575 in taxpayer money from the Office of Naval Research from April 16, 2020, to April 15, 2023,⁴ and will receive additional funding of \$760,388 for oxygen toxicity experiments from July 1, 2023, till June 30, 2026.⁵

¹ Letter from Swaminathan S. to President Law RF. regarding ending the use of animals for decompression research at USF. July 20, 2023. Accessed October 19, 2025.

<https://www.peta.org/wp-content/uploads/2024/03/2023-07-20-letter-to-usf-re-navy-decompression-viv.pdf>.

² U.S. Navy. Responsive Records. USF. Accessed October 19, 2025. <https://www.peta.org/wp-content/uploads/2023/04/navy-responsive-records-usf.pdf>.

³ U.S. Navy. Responsive Records.

⁴ Defense Technical Information Center. Award Number: N000142012434. Grant Title: Mitigation of CNS Oxygen Toxicity: Mitochondria Targeted Anti-Oxidant Therapy and Aquaporin Gas Channels. Accessed October 19, 2025. https://dtic.dimensions.ai/details/grant/grant.9143441?or_facet_researcher=ur.0614015446.21.

⁵ U.S. Department of the Treasury. 2025. Federal award detail: *ASST_NON_N000142312717_1700* - Mitigation of CNS Oxygen Toxicity: Mitochondria Targeted Anti-Oxidant Therapy and Aquaporin Gas Channels. USAspending.gov. Accessed October 21, 2023. https://www.usaspending.gov/award/ASST_NON_N000142312717_1700.

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Per Dean's currently active IACUC protocol and his previous similar Navy-funded projects, his experiments involve inducing seizures in rats without administering analgesics, cutting open their abdomens and embedding a recording device and a battery inside them, and invasively placing four wires that traverse along the rats' backs and necks and reappear at the skin over their skulls. Experimenters then restrain the rats, drill into their skulls, and attach electrodes to them. After the experiments, the animals are killed.^{6,7}

Non-Animal Research Methods are Widely Available

Similar U.S. Navy-funded decompression experiments at other institutions⁸ have been terminated early,^{9,10} and superior non-animal research methods (e.g., analyses of human diver data, in vitro human endothelial models, computational and in-silico tools) are available and already advancing the field.^{11,12,13,14,15,16} Instead of using animals, USF could prioritize validation and expansion of existing human diver datasets and risk-prediction models;^{17,18} in-vitro studies using

⁶ U.S. Navy Responsive Records. 2025.

⁷ Posada-Quintero HF, Landon CS, Stavitzski NM, Dean JB, Chon KH. Seizures Caused by Exposure to Hyperbaric Oxygen in Rats Can Be Predicted by Early Changes in Electrodermal Activity. *Front Physiol.* 2022;12:767386. Accessed October 19, 2025. [doi:10.3389/fphys.2021.767386](https://doi.org/10.3389/fphys.2021.767386).

⁸ UW-Madison Institutional Animal Care and Use Committee Protocol Number V006315. Accessed September 14, 2025. <https://www.peta.org/wp-content/uploads/2023/01/uw-madison-iacuc-V006315.pdf>.

⁹ People for the Ethical Treatment of Animals. (n.d.). October 24, 2023. *Victory! PETA pressure squeezes U.S. Navy to scrap gruesome decompression tests on sheep*. PETA. Accessed October 19, 2025. <https://www.peta.org/media/news-releases/victory-peta-pressure-squeezes-u-s-navy-to-scrap-gruesome-decompression-tests-on-sheep/>.

¹⁰ PETA. (n.d.). October 24, 2023. *Cruel Navy-funded tests on sheep canceled*. PETA. Accessed October 17, 2025. <https://www.peta.org/about-peta/victories/cruel-navy-funded-tests-on-sheep-canceled/>.

¹¹ Palkovic M, Novomeský F, Zaviacic M, Danihel L, Kovác P, Danisovic L. The use of cell cultures for in vitro decompression sickness simulation. *Soud Lek.* 2007;52(1): 9-16. Accessed October 19, 2025.. <https://pubmed.ncbi.nlm.nih.gov/17370505/>.

¹² Jang DH, Owiredu S, Ranganathan A, Eckmann DM. Acute decompression following simulated dive conditions alters mitochondrial respiration and motility. *Am J Physiol Cell Physiol.* 2018;315(5):C699C705. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/30110561/>.

¹³ Wienke BR. Computer validation and statistical correlations of a modern decompression diving algorithm. *Comput Biol Med.* 2010;40(3):252-260. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/20080233/>.

¹⁴ Germonpré P, Lafère P, Portier W, Germonpré FL, Marroni A, Balestra C. Increased risk of decompression sickness when diving with a right-to-left shunt: Results of a prospective single-blinded observational study (the "Carotid Doppler" study). *Front Physiol.* 2021;12:763408. Accessed October 19, 2025. [doi:10.3389/fphys.2021.763408](https://doi.org/10.3389/fphys.2021.763408).

¹⁵ Honěk J, Šrámek M, Honěk T, et al. Screening and risk stratification strategy reduced decompression sickness occurrence in divers with patent foramen ovale. *JACC Cardiovasc Imaging.* 2022;15(2):181-189. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/34419390/>.

¹⁶ Han KH, Hyun GS, Jee YS, Park JM. Effect of water amount intake before scuba diving on the risk of decompression sickness. *Int J Environ Res Public Health.* 2021;Jul 16; 18(14):7601. Accessed October 19, 2025. [doi:10.3390/ijerph18147601](https://doi.org/10.3390/ijerph18147601).

¹⁷ King AE, Andriano NR, Howle LE. Trinomial decompression sickness model using full, marginal, and non-event outcomes. *Comput Biol Med.* 2020;118:103640. Accessed October 19, 2025. [doi:10.1016/j.compbimed.2020.103640](https://doi.org/10.1016/j.compbimed.2020.103640).

¹⁸ Cialoni D, Pieri M, Balestra C, Marroni A. Dive risk factors, gas bubble formation, and decompression illness in recreational SCUBA diving: Analysis of DAN Europe DSL data base. *Front Psychol.* 2017;8. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/28974936/>.

human cells/tissues under simulated dive conditions;^{19,20,21} and, computational modeling, machine-learning methods, and dive-computer algorithms.^{22,23}

Federal Agencies are Shifting Away from Animal Testing

Recently, several U.S. agencies announced historic plans to phase out animal testing,²⁴ in alignment with PETA's Research Modernization NOW strategic framework for modernizing research toward human-relevant methods²⁵:

- *Food and Drug Administration (FDA)*: The FDA 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," to "improve drug safety and accelerate the evaluation process, while reducing animal experimentation, lowering research and development (R&D) costs, and ultimately, drug prices."²⁶
- *The National Institutes of Health (NIH)*: The NIH, the world's largest public funder for biomedical research²⁷— announced a major new initiative on April 29, 2025, "to expand innovative, human-based science while reducing animal use in research."²⁸ On May 4, 2025, the agency closed its in-house beagle lab, where dogs were used in sepsis and pneumonia experiments.²⁹ On May 23, 2025, the agency also terminated funding for Harvard experiments that involved sewing shut the eyes of baby monkeys and subjecting

¹⁹ Hesthammer R, Eide T, Thorsen E, Svardal AM, Djurhuus R. Decrease of tetrahydrobiopterin and NO generation in endothelial cells exposed to simulated diving. *Undersea Hyperb Med.* 2019;46(2):159-169. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/31051061/>.

²⁰ Hesthammer R, Eide T, Thorsen E, Svardal AM, Djurhuus R. Hyperoxia and lack of ascorbic acid deplete tetrahydrobiopterin without affecting NO generation in endothelial cells. *Undersea Hyperb Med.* 2019;46(4):509-519. Accessed October 19, 2025. <https://pubmed.ncbi.nlm.nih.gov/31509907/>.

²¹ Hesthammer R, Dahle S, Storesund JP, Eide T, Djurhuus R, Svardal AM, Thorsen E. Nitric oxide in exhaled gas and tetrahydrobiopterin in plasma after exposure to hyperoxia. *Undersea Hyperb Med.* 2020;47(2):197-202. Accessed October 19, 2025. [Nitric oxide in exhaled gas and tetrahydrobiopterin in plasma after exposure to hyperoxia. - Abstract - Europe PMC.](#)

²² Hess HW, Hostler D, Clemency BM, St. James E, Johnson BD. Carotid body chemosensitivity is not attenuated during cold water diving. *Am J Physiol Regul Integr Comp Physiol.* 2021;321(2):R197R207. Accessed October 19, 2025. <https://www.google.com/search?q=https://doi.org/10.1152/jappphysiol.00275.2020>.

²³ Hess HW, Hostler D, Clemency BM, Johnson BD. Carotid body chemosensitivity at 1.6 ATA breathing air versus 100% oxygen. *J. Appl. Physiol.* 2020;129(2):247-256. Accessed October 19, 2025. [doi:10.1152/jappphysiol.00275.2020](https://doi.org/10.1152/jappphysiol.00275.2020).

²⁴ PETA. (n.d.). *The Trump administration's achievements for science and animals*. People for the Ethical Treatment of Animals. Accessed October 17, 2025. Accessed October 19, 2025. <https://www.peta.org/misc/the-trump-administrations-achievements-for-science-and-animals/>.

²⁵ PETA. (n.d.). Research Modernization NOW. November 2024. Accessed October 21, 2025. <https://www.peta.org/wp-content/uploads/2020/12/peta-2021-research-modernization-deal.pdf>.

²⁶ US FDA. (n.d.). FDA Announces Plan to Phase Out Animal Testing Requirement for Monoclonal Antibodies and Other Drugs. April 10, 2025. Accessed October 20, 2025. <https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-mono-clonal-antibodies-and-other-drugs>.

²⁷ National Institutes of Health. (n.d.). January 21, 2025. *Grants & funding*. Accessed October 15, 2025. <https://www.nih.gov/grants-funding>.

²⁸ NIH. (n.d.). NIH to prioritize human-based research technologies. April 29, 2025. Accessed October 19, 2025. <https://www.nih.gov/news-events/news-releases/nih-prioritize-human-based-research-technologies>.

²⁹ Fox News. July 15, 2025. *NIH closes experimentation labs accused of brutally killing thousands of beagles for 40+ years*. Fox News. Accessed October 16, 2025. <https://www.foxnews.com/politics/nih-closes-experimentation-labs-accused-brutally-killing-thousands-beagles-40-years>.

them to visual deprivation.³⁰ These studies were exposed by PETA in 2022.³¹ On May 28, 2025, the NIH launched a new autism research funding opportunity that explicitly excludes animal experiments.³² On July 7, 2025, they also announced a major policy change. During a joint webinar with the FDA, NIH leaders stated that the agency will no longer seek proposals exclusively for animal models.³³ Dr. Nicole Kleinstreuer, the Acting NIH Deputy Director for Program Coordination, Planning, and Strategic Initiatives, and a leader in reliable and human-relevant non-animal testing, emphasized that improving human health, "cannot be fulfilled using outdated animal-based models that fail to translate to human outcomes." Dr. Kleinstreuer also stated that "[w]e are very well placed to move away from animal-based models."^{34,35} On July 9, 2025, the NIH announced the early expiration of a funding opportunity for monkey experiments, which had involved injecting pregnant monkeys with viruses and dissecting their offspring.^{36 37}

- *The Department of Government Efficiency (DOGE)*: On March 4, 2025, DOGE canceled 10 NIH grants for invasive "transgender animal" experiments, which had cost over \$10 million. PETA had previously exposed these studies as wasteful and unethical.³⁸
- *U.S. Navy*: The Secretary of the U.S. Navy, on May 27, 2025, announced a complete ban on Navy-funded experiments on dogs and cats, ending decades of such testing.³⁹
- *The U.S. Coast Guard (USCG)*: The USCG reaffirmed, on June 23, 2025, that it has ended its use of animals in battlefield trauma training, also known as live tissue training,

³⁰ NIH [@NIH]. May 29, 2025. [IH has terminated funding at Harvard University for studies that included sewing the eyes of young monkeys shut....] [Post]. X. Accessed October 16, 2025.

<https://x.com/NIH/status/1928136701429284991>.

³¹ PETA. (n.d.). May 23, 2025. *Harvard loses infant monkey torture funds*. People for the Ethical Treatment of Animals. Accessed July 15, 2025. Accessed October 16, 2025. <https://www.peta.org/news/harvard-loses-infant-monkey-torture-funds/>.

³² NIH. (n.d.). *Autism Data Science Initiative: Funding opportunities*. Division of Program Coordination, Planning, and Strategic Initiatives. Accessed October 21, 2025. <https://dpcpsi.nih.gov/autism-data-science-initiative/funding-opportunities>.

³³ PETA. (n.d.). *NIH and FDA urged to adopt non-animal toxicology test methods*. PETA. Accessed October 19, 2025. <https://www.peta.org/news/nih-fda-non-animal-toxicology-test-methods/>.

³⁴ *Ibid.*

³⁵ U.S. Food and Drug Administration. July 10, 2024. *FDA & NIH workshop on reducing animal testing* [Video]. YouTube. Accessed October 19, 2025. <https://www.youtube.com/embed/FUWQ1V8DI-c?feature=oembed&enablejsapi=1&origin=https%3A%2F%2Fwww.peta.org>.

³⁶ National Institute of Allergy and Infectious Diseases. July 9, 2025. *Notice of early expiration of PAR-23-073, "Mentored Career Development Program for Early Stage Investigators Using Nonhuman Primate Research Models (K01 Independent Clinical Trial Not Allowed)" (NOT-AI-25-040)*. NIH. Accessed October 16, 2025. <https://grants.nih.gov/grants/guide/notice-files/NOT-AI-25-040.html>.

³⁷ NIH (n.d.). 2023. *PAR-23-225: HIV/AIDS Scholars Using Nonhuman Primate (NHP) Models Program (K01 Independent Clinical Trial Not Allowed)*. U.S. Department of Health and Human Services. Accessed October 16, 2025. <https://grants.nih.gov/grants/guide/pa-files/PAR-23-225.html>.

³⁸ Department of Government Efficiency [@DOGE] [Yesterday, @NIH cancelled seven grants for transgender experiment on animals...]. Accessed October 17, 2025. <https://x.com/DOGE/status/1897272661291753928>.

³⁹ Secretary of the Navy [@SECNAV]. May 27, 2025. [Today it gives me great pleasure to terminate all Department of the Navy's testing on cats and dogs, ending these...] [Post]. X. Accessed October 18, 2025. <https://x.com/SECNAV/status/1927500765817393569?s=19>.

following concerns raised by PETA. The military branch stated it does not and will not conduct such training.⁴⁰

These decisions signal a broader national shift toward more effective, ethical and economical animal-free research—creating a clear opportunity for USF to stay in sync with state-of-the-art research methods and lead by example in this domain.

You can contact me at MaggieW@peta.org. Thank you for your consideration of this important issue, and I look forward to your reply.

Sincerely yours,



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⁴⁰ Letter from Gautier PW to PETA confirming that the USCG does and will not use live tissue training. June 23, 2025. Accessed October 17, 2025. <https://www.peta.org/wp-content/uploads/2025/06/2025-06-24-response-to-letter-to-uscg-commandant-ask-to-end-viv-in-ltt.pdf>.