

November 5, 2025

Axel Wolff, MS, DVM

Acting Director
Office of Laboratory Animal Welfare
National Institutes of Health

Walter J. Koroshetz, M.D.

Director

National Institute of Neurological Disorders and Stroke

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U.S. Department of Health and Human Services

Via email: olaw@mail.nih.gov; koroshetzw@mail.nih.gov; askori@hhs.gov

Re: Karolinska Institute, NIH Grant R01 NS064964 (Tatiana Deliagina)

Dear Drs. Wolff, Koroshetz, and Garrity:

Thank you in advance for your time. I write on behalf of People for the Ethical Treatment of Animals (PETA), whose entities represent more than 10.4 million members and supporters globally. PETA has obtained records from the Karolinska Institute (KI) in Sweden documenting invasive and prolonged experiments on rabbits conducted by Tatiana Deliagina, who is funded by the National Institute of Neurological Disorders and Stroke (NINDS) under grant R01-NS064964, Restoration of Postural Control After Spinal Cord Injury. These records raise serious concerns about animal welfare and compliance with the National Institutes of Health's (NIH) policies.

We respectfully request that:

- 1. The Office of Laboratory Animal Welfare (OLAW) withdraw the Karolinska Institute's Public Health Service (PHS) Animal Welfare Assurance (F16-00001 [A5002-01]) due to apparent systemic and chronic violations of the PHS Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*).
- 2. NINDS suspend funding to Dr. Tatiana Deliagina pending a full review of compliance with NIH animal welfare standards.
- 3. The Office of Research Integrity (ORI) initiate an investigation into whether the grant's progress reports and associated publications contain any misrepresentations of experimental procedures or outcomes, and take appropriate corrective action if research misconduct is confirmed.

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Findings

Records obtained by PETA through an information request submitted to the KI document a disturbing pattern of invasive and prolonged experimentation on rabbits under NIH-funded Tatiana Deliagina. Between September 2021 and May 2025, at least 127 male rabbits were subjected to spinal cord injuries, brain and spinal injections, electrode implantations, and decerebration in procedures described as "electrophysiological acute experiments on decerebrated rabbit preparations" and "behavioral and electrophysiological experiments" to study postural recovery. Deliagina has received \$3,752,020 from NINDS since 2004 to conduct these experiments.

The documents obtained reveal:

- 1. Failure to promptly euthanize animals after humane endpoints were reached
- 2. Lack of timely veterinary monitoring and intervention
- 3. Poor monitoring and care, including neglecting rabbits showing signs of distress, weight loss, inability to eat or groom, and screaming.
- 4. Inconsistent records of electrode implantation, despite the nature of the experiments requiring it

Of particular concern is the apparent lack of consistent veterinary oversight. According to both the PHS policy and the *Guide*, minimizing pain, discomfort, and distress to animals by establishing humane endpoints is paramount. However, records show that seven rabbits were deemed to have met the experiment's termination criteria, yet were kept alive for up to 50 additional days. In none of these cases do the records indicate that veterinary checks were performed between the moment the termination criteria were established and the date the animals were killed. Only one of these rabbits (ID 01036) was euthanized—nine days after meeting the experiment's termination criteria—without further experimentation, but the remaining six were subjected to additional procedures (see Table 1), including the "acute experiment," which involved tracheotomy, spinal exposure, decerebration, and testing and recording of nerve activity while the rabbit was attached to a tilting platform. In one case (ID 4D2104), despite the extremely poor condition of the rabbit, the imminent need for euthanasia, and the experimenter being informed of the situation, the animal was subjected to the acute experiment on the following day.

The *Guide* also emphasizes the critical importance of post-operative care, which in this case was deficient, inconsistent, and inadequately documented. One rabbit (ID 3D2483) was found screaming in the cage, but the records don't show any monitoring performed in the following 20 days until he was euthanized. Another rabbit (ID 3D2486) was also screaming and was found lying on his side; however, the next note on his record is the euthanasia performed a month later. The rabbit identified as 4D2128 was subjected to two postural testing sessions and the acute experiment within three weeks following the assessment of his "low condition." His records lack annotations regarding the evolution of his condition during this period and until he was killed. While rabbits received analgesics, most records lack any mention of follow-up care except for a few annotations regarding their weight (see Table 2).

Table 1. Rabbits euthanized up to 50 days after meeting Deliagina's experiment termination criteria.

Rabbit ID	Date	Note on records	Number of days until euthanasia
01036	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	9
	2025-04-11	"Rabbit was sacrificed by Pentobarbital Na (>100 mg/kg) due to achievements of humane endpoint."	
01037	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	50
	2025-05-22	"The rabbit was taken to the acute experiment."	
01038	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	43
	2025-05-15	"The rabbit was taken to the acute experiment."	
01039	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	41
	2025-05-13	"The rabbit was taken to the acute experiment."	
01040	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	42
	2025-05-14	"The rabbit was taken to the acute experiment."	
01041	2025-04-02	"The rabbit is assessed to fall within the experiment's termination criteria." [Original in Swedish]	48
	2025-05-20	"The rabbit was taken to the acute experiment."	
4D2104	2025-02-03	"General condition is okay, but the rabbit is weak in the hindquarters and cannot lift its hind body off the ground. The endpoint is considered reached. Researcher informed via email." [Original in Swedish] "The 'Health Issue' flag has been set."	
	2025-02-04	[Acute experiment] "Decerebration under Isoflurane anesthesia The trachea was cannulated. The animal was then decerebrated. The scalpel entered the brainstem at the precollicular level. After decerebration, the anesthesia was discontinued. Recordings in decerebrated animals were started no less than 1 h after cessation of anesthesia. The physiological parameters (breathing, blood pressure, temperature) were controlled during the experiment. Precollicular- postmammillar decerebration. The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) + decapitation."	1

Table 2. Sparse notes on rabbits' follow-up care.

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Rabbit ID	Date	Note on records			
	2023-04-14	"The rabbit is thin and the weight is 2.570 kg. There is less feces and urine than normal on the pad under the cage. A little of banan [sic], cucumber and pellets has been eaten since yesterday but the appetite is reduced. The teeth and the wound are OK. The weight needs to be checked daily to make sure that the rabbit does not continue to loose [sic] weight."			
2D3208	2023-04-15	"Weight 2493 g, continues to lose weight. Has pooped a little. Giving pellets in a bowl, carrot, parsley, and apple. General condition is okay." [Original in Swedish]			
	2023-04-16	"Weight 2368 g. Continues to lose weight but has eaten and pooped a lot. Starting to approach 15% weight loss. Seems alert." [Original in Swedish]			
	2023-04-17	"The postural performance of the rabbit on the tilting platforms was tested The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."			
3D2483	2023-09-07	"At about 14.40 the rabbit was laying [sic] on the side in the cage and screaming. At about 15.00 the rabbit was sitting up and eating." "The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was tested			
	2023-09-27	The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."			
3D2486	2023-09-04	"Around 15.00 a rabbit screaming was heard from the lab next door. When checking the rabbits, this rabbit was lying on the side. Shortly after, about 15-20 min., the rabbit was sitting and eating. It had a slight head tilt, otherwise it seemed normal then." "The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was tested"			
-	2023-10-03	"The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."			
	2023-11-24	"Has recovered slowly from the injection 22/11 with eating and drinking less and less active, and low."			
	2023-11-27	"Body weight: 2.412 kg"			
	2023-11-29	"Body weight: 2.378 kg. Body weight before surgery was: 2.420 kg."			
2D2501	2023-12-01	"Body weight: 2.428 kg"			
3D2581	2023-12-05	"Body weight: 2.546 kg"			
	2023-12-20	"The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was testedThe rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."			
	2023-11-24	"Has recovered slowly from the injection 23/11 with eating and drinking less and less active, and low."			
2D2604	2023-11-26	"Can't swallow food, chews food but only fills mouth. Picked out lots of food from mouth that it couldn't swallow. Weight 2347 gr, very thin." [Original in Swedish]			
3D2604	2023-11-27	"Body weight: 2.320 kg"			
	2023-11-28	"Body weight: 2.252 kg"			
	2023-11-29	"Body weight: 2.240 kg. Body weight before surgery was: 2.520 kg."			
	2023-11-30	"Body weight: 2.230 kg."			
	2023-12-01	"Body weight: 2.323 kg"			

Rabbit ID	Date	Note on records	
	2023-12-04	"Body weight on 20231203: 2.555 kg" "Body weight: 2.455 kg"	
	2023-12-05	"Body weight: 2.568 kg"	
	2023-12-15	"The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was tested"	
	2023-12-18	"The postural performance of the rabbit on the tilting platforms was tested"	
	2023-12-21	"The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."	
	2024-03-17	"The rabbit is a little wet and sticky around the mouth/bridge of the nose. Moves ok but a little unsteady. Nothing else seems abnormal."	
3D2782	2024-04-11	"The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was tested"	
	2024-04-16	"Decerebration under Isoflurane anesthesia"	
	2024-04-04	"Hasn't eaten or drunk, new weight today 1736 gr." [Original in Swedish]	
2024-04-05 rabbit was sacrificed by overdose of Pentobarbital Na (>1		[Acute experiment] "Decerebration under Isoflurane anesthesia The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."	
	2024-05-11	"Weight: 2132 g. Unsteady, front legs are weak. Urinates and eats a bit of banana under observation." [Original in Swedish]	
4D2034	2024-05-13	"Vet. supervision. Has reduced general condition. Is less active and unwilling to move. Eats and drinks some, but the coat is unkempt. Keep an eye on it so that it improves its condition and does not reach the breakpoint." [Original in Swedish] "The rabbit was taken to the acute experiment. Decerebration under Isoflurane anesthesia The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."	
4D2118	2024-10-07	"The rabbit has very little fecal pellets and not much urine either. the [sic] weight is 2525 g compared with 2900 g before injection on 2 October. The mouth was full of feed and it seems having trouble swallowing. The feed in the mouth was removed and the rabbit was dirty around the mouth and nose. The rabbit was not very interested when offered an apple. The general condition is low. A rabbit that is not eating and drinking properly is a serious condition and euthanasia should be considered before the condition gets worse."	
	2024-10-15	"The rabbit was shaved for the postural experiment. The postural performance of the rabbit on the tilting platforms was tested"	
	2024-10-18	"The postural performance of the rabbit on the tilting platforms was tested"	
	2024-10-28	"The rabbit was taken to the acute experiment The rabbit was sacrificed by overdose of Pentobarbital Na (>100 mg/kg) and perfused with formalin."	
	2022-04-26	"Cleaned the anal area." [Original in Swedish]	
1D3039	2022-05-23	"The rabbit was taken to acute experiment Was sacrificed by overdose of Pentobarbital Na + decapitation"	
	2022-04-09	"Cleaned the anal area." [Original in Swedish]	
1D3054	2022-04-26	"Washed thoroughly and clipped away matted fur around the rump" [Original in Swedish]	

Rabbit ID	Date	Note on records	
	2022-05-05	"Weight 3556 g. washed the rump and applied Inotyol" [Original in Swedish]	
	2022-05-17	"The rabbit was taken to acute experiment Was sacrificed by overdose of Pentobarbital Na + decapitation"	
K33348	2022-01-09	"Weight: 3080 g. Washed away urine and feces from the rear. Feels sore in the rear area." [Original in Swedish]	
	2022-01-12	"The rabbit was taken to acute experiment Was sacrificed by overdose of Pentobarbital Na + decapitation"	
K33381	2021-12-11	"Cleaned around the genitals when feces have accumulated and dried on' [Original in Swedish]	
	2022-01-28	"The rabbit was taken to acute experiment Was sacrificed by overdose of Pentobarbital Na + decapitation"	

This pattern of neglect highlights a troubling disregard for basic animal welfare standards and an alarming lack of veterinary accountability. The severity and duration of the procedures, along with the absence of timely intervention, raise serious concerns about the KI's compliance with NIH standards for the treatment of animals used in biomedical research. That this is happening at a prestigious institution—one responsible for selecting Nobel laureates—emphasizes the great vulnerability of animals used in NIH-funded experiments conducted overseas, where the agency has limited oversight.

This is the second documented case in which a detailed review of procedures at a foreign research institution has uncovered a serious neglect of animal welfare. After <u>PETA's findings in Colombia</u>, this case in Sweden highlights a troubling pattern: experiments funded by NIH and carried out outside the U.S. are taking place in environments lacking proper oversight, transparency, and accountability. These ongoing violations emphasize the urgent need to stop providing federal research funds to experiments on animals in foreign labs, where U.S. regulations do not apply and animals are left at risk of prolonged suffering.

We respectfully urge you to act swiftly. You may contact me at MagnoliaM@peta.org. I look forward to your response and to learning about the actions that you take to address this urgent issue.

Sincerely,

Magnolia Martínez, Ph.D.

full Magnolia

Lead Projects Manager and Congressional Liaison

Laboratory Investigations Department

cc: Jayanta Bhattacharya, M.D., Ph.D., Director, National Institutes of Health

Nicole Kleinstreuer, Ph.D., Acting Deputy Director for Program Coordination, Planning, and Strategic Initiatives, National Institutes of Health

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