AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA

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Dear Professor Jane:

I am writing to follow up on our July 22, 2025, letter to you that was signed by PETA U.S., PETA Australia, and Alliance for HOPE International,[1] for which we did not receive a response. In this letter, we offer a range of scientific and ethical critiques regarding mild traumatic brain injury (mTBI), non-fatal strangulation (NFS), and forced swim test (FST) experiments on rats at Monash University that attempted to examine the health consequences of intimate partner violence (IPV) in humans.[2,3]

After reviewing the recent letter from Monash University's Dr. Sandy Shultz to *The Journal of Pain* addressing the concerns raised by Animal Free Research Advocacy and the Physicians Committee for Responsible Medicine,[4] we note that his response doesn't fully address the concerns outlined in our previous letter, nor did he acknowledge the growing consensus within the scientific community that these cruel and largely irrelevant to human biology methods[5] are rapidly losing their scientific relevance and are ethically indefensible.

Far from pivoting to more human-relevant methods, Shultz and his collaborators have doubled down on this problematic, animal-based IPV approach in a new

[1]Letter from PETA U.S., PETA Australia, and Alliance for HOPE International to Pickering S. at Monash University. Request to end the strangulation, TBI, and FST animal experiments. July 22, 2025. Accessed November 6, 2025. https://www.peta.org/wp-content/uploads/2025/07/2025-07-22-rebuttal-to-monash-uni-response-re-rat-strangulation-study.pdf.

[2]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. https://www.sciencedirect.com/science/article/pii/S0889159124006342.

[3]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. https://pubmed.ncbi.nlm.nih.gov/39730020/.

[4]Letter from Shultz S. at Monash to Pariante C at The Journal of Pain. Request to end the strangulation, TBI, and FST animal experiments. May 6, 2025. Accessed November 6, 2025. https://www.peta.org/wp-content/uploads/2025/11/2025-10-07-letter-from-monash-to-jpain-defending-viv-re-afsa-and-pcrm-letter.pdf.

[5]Marshall LJ, Bailey J, Cassotta M, Herrmann K, Pistollato F. Poor Translatability of Biomedical Research Using Animals - A Narrative Review. Altern Lab Anim. 2023 Mar;51(2):102-135. https://pubmed.ncbi.nlm.nih.gov/36883244/.

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study published in *Molecular Psychiatry*[6] since our July 22 letter—a move that only reinforces our concerns by intensifying the ethical and scientific flaws raised previously. The new protocol administers psilocybin to juvenile female rats several weeks after recovery from repeated daily cycles (i.e., five days) of mTBI and NFS, increasing cumulative distress and risk of adverse events[7] and preserving the ethically problematic practice of withholding pre-emptive analgesia and inflicting severe injury (e.g., by using 680g weight on the delicate trachea or juvenile rats), as previously pointed out by unaffiliated veterinarians and bioethicists.[8] Layering a psychedelic drug onto the IPV approach may introduce significant confounds; psilocybin's broad effects on arousal and sensory processing likely make it difficult to distinguish true "IPV recovery" from drug-induced state changes. These interpretive limitations may be exacerbated using FST—a poor proxy for human depression,[9] and likely a limited translational tool in animals with severely altered motor and physiological states. Ultimately, this study magnifies the weaknesses of the IPV approach without justifying why human-based research tools were ignored.

Concerns About Scientific Necessity and the Mistreatment of Animals Remain

Shultz's response attempts to justify egregious harm to animals by citing legacy practices and past approvals, but neither is ethically defensible—particularly when the relevance of animal models to human health is proving cursory at best.

His characterization of specialist critiques[10,11] as "ideological" is a misrepresentation. As cited in *The Guardian*,[12] objections from subject matter experts are based on substantive scientific issues—like imposing severe animal distress for doubtful value—not on a blanket opposition to animal experimentation. Because this criticism is grounded in scientific reasoning rather than ideology, it underscores a deeper issue: the formal approval process may fail to meet the standards of scientific and ethical rigor. When domain experts question a study's validity, it is a scientific signal, not rhetoric.

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[6]Allen J, Sun M, Baker TL, Dames S, Kryskow P, Christie BR, McDonald SJ, Shultz SR. Psilocybin mitigates chronic behavioral and neurobiological alterations in a rat model of recurrent intimate partner violence-related brain injury. *Mol Psychiatry* (2025). https://doi.org/10.1038/s41380-025-03329-x

[7]Prins ML, Alexander D, Giza CC, Hovda DA. Repeated mild traumatic brain injury: mechanisms of cerebral vulnerability. *J Neurotrauma*. 2013 Jan 1;30(1):30-8. https://pmc.ncbi.nlm.nih.gov/articles/PMC4047842/.

[8]Stock P. February 14, 2025. *Rats strangled in part government-funded Australian domestic violence study*. The Guardian. Accessed October 3, 2025. https://www.theguardian.com/world/2025/feb/14/rats-strangled-in-part-government-funded-australian-domestic-violence-study-ntwnfb.

[9]Trunnell ER, Carvalho C. The forced swim test has poor accuracy for identifying novel antidepressants. *Drug Discov Today.* 2021 Dec;26(12):2898-2904. https://pubmed.ncbi.nlm.nih.gov/34390862/.

[10]Knight A. Andrew Knight [LinkedIn page]. LinkedIn. Accessed October 7, 2025. https://www.linkedin.com/in/andrew-knight-409b7434/?originalSubdomain=uk.

[11]*Johns Hopkins Bloomberg School of Public Health*. Herrmann K – Faculty profile. Accessed October 7, 2025. https://publichealth.jhu.edu/faculty/3518/kathrin-herrmann.

[12]Stock. 2025.

Current guidance in Australia has moved against using the FST as a model of human depression and anxiety, absent a compelling scientific rationale.[13,14,15,16] Continued reliance on FST as a routine approach is not consistent with that direction and compounds our concern.

Scientifically Viable, Human-Based Tools Already Exist

Rapidly developing organoid platforms offer unprecedented opportunities to study human neurotrauma with greater fidelity, without the ethical compromises inherent in using animals. For instance, microphysiological systems (MPS)—including organ-on-a-chip platforms and advanced organoids—are credible tools for addressing mechanism, safety, and efficacy questions that have traditionally defaulted to animals. The creative use of such tools can help neuroscientists characterize neurological phenomena relevant to understanding neurological trauma, including neuroinflammation, microglia–neuron crosstalk, blood-brain barrier (BBB) integrity and transport, and injury-related signaling.[17]

- **Human BBB + neurons/glia + microglia for neuroinflammation**: these chips recreate human BBB barrier function and cell–cell crosstalk, and the platform predicts in vivo BBB-crossing differences for therapeutics.[18]
- **BBB-on-chip platforms** reproduce human BBB function, cell-type–specific inflammatory responses, and predict BBB-crossing differences for therapeutics—showing in vitro/in vivo correlation useful for screening new therapies.[19]
- **Human cortical organoids with mechanical injury** reproduced key signs of TBI phenotypes (neuronal death or neuroprotein dysfunction) and have already identified at least some genetic inhibitions as protective, demonstrating that this method can be used for both modeling injury and discovering new therapies in a human-relevant context.[20]
- **Microglia-containing organoids** maintain long-term, functional microglia with phagocytosis and neuroinflammatory responses, enabling human-specific studies of microglia–neuron interactions.[21]

Collectively, these resources show that characterizing the various neurobiological consequences of IPV can now be pursued in human-relevant systems. Continuing to rely on irrelevant tests in

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[13]Trunnell, Carvalho. 2021.

[14]Molendijk ML, de Kloet ER. Immobility in the forced swim test is adaptive and does not reflect depression. *PNEC*. 2015: 62:389-391. https://pubmed.ncbi.nlm.nih.gov/26386543/

[15]PETA. Victories! PETA is ending near-drowning experiments on animals. Accessed October 7, 2025. https://www.peta.org/features/peta-ends-near-drowning-tests-small-animals/.

[16]NHMRC. Statement on forced swim test rodent models. December 13, 2023. Accessed October 7, 2025. https://www.nhmrc.gov.au/research-policy/ethics/statement-forced-swim-test-rodent-models.

[17]Kandel ER, Koester JD, Mack SH, Siegelbaum SA. (Eds.). 2021. *Principles of neural science* (6th ed.). McGraw Hill. Accessed October 6, 2025. https://users.ece.cmu.edu/~byronyu/papers/PNS-6thEdition-SectionV-Motor-Chapter39-BMIs.pdf.

[18]Pediaditakis I, Kodella KR, Manatakis DV, Le CY, Barthakur S, Sorets A, Gravanis A, Ewart L, Rubin LL, Manolakos ES, Hinojosa CD, Karalis K. A microengineered Brain-Chip to model neuroinflammation in humans. *iScience*. 2022 Jul 21;25(8):104813. https://pmc.ncbi.nlm.nih.gov/articles/PMC9379671/.

[19]Chim SM, Howell K, Kokkosis A, Zambrowicz B, Karalis K, Pavlopoulos E. A Human Brain-Chip for Modeling Brain Pathologies and Screening Blood-Brain Barrier Crossing Therapeutic Strategies. *Pharmaceutics*. 2024 Oct 10;16(10):1314. https://www.mdpi.com/1999-4923/16/10/1314.

[20]Wang H, Yin J, Li X, Jiang X, Shao F, Sun Y, Liu Y, Zhang S, Yang S, Cheng F, Zhou Y, Jing N. Modeling traumatic brain injury with mechanically injured human cortical organoids. *Cell Stem Cell*, 2024:*31*(4), 514–531.e9. https://pmc.ncbi.nlm.nih.gov/articles/PMC9009274/.

[21]Rittenhouse A, Krall C, Plotkin J, Alam El Din DM, Kincaid B, Laird J, Smirnova L. Microglia-containing neural organoids as brain microphysiological systems for long-term culture. *Front Cell Neurosci.* 2025: *19*. https://doi.org/10.3389/fncel.2025.1616470.

rats raises serious questions about the commitment to human-relevant science and risks wasting public funds on research that overwhelmingly fails to translate to meaningful clinical outcomes.[22]

Largest Research Funding Agencies Are Shifting Away From Animal Testing

Recently, many agencies within the U.S. federal government announced historic plans to phase out animal testing.[23,24] Most notably, the 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."[25] It is increasingly apparent that there is a growing shift abroad away from animal experimentation and toward superior animal-free research, and we encourage Monash University to emulate this embrace of human-relevant science.

Request for Action

We urge Monash University to reconsider its approach and prioritize research methods that are both ethically sound and scientifically progressive. This includes:

- Ending the use of animals in experiments that involve strangulation, TBI, and FST methods.
- Redirecting funding toward organoid-based platforms and other innovative tools that better serve the goal of improving human health.
- Establishing an independent review process*, including external ethics and MPS experts*, to assess if non-animal methods can achieve the same research aims as the animal experiments.
- Developing a formal plan and timeline to fully transition to non-animal research methods, using recognized benchmarks.[26,27,28]
- Implementing a strategic transition plan, such as the roadmap outlined in PETA U.K.'s Research Modernization Deal.[29]

You may contact me directly via e-mail at MaggieW@peta.org. We look forward to your response and hope it reflects a genuine commitment to progress.

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[22]Sharoni ES. Which concepts are key to transitioning from nonhuman animal models to engineered microphysiological systems in biomedical research? *AMA J Ethics. 2025: 26*(9), E711–E719. https://journalofethics.ama-assn.org/article/which-concepts-are-key-transitioning-nonhuman-animal-models-engineered-microphysiological-systems/2024-09.

[23]PETA. *(n.d.). The Trump administration's achievements for science and animals*. People for the Ethical Treatment of Animals. Accessed November 5, 2025. https://www.peta.org/misc/the-trump-administrations-achievements-for-science-and-animals/.

[24]Bedard P. May 28, 2025. Trump cheered as 'best friend of animals' after research grants nixed. *Washington Examiner*. Accessed November 5, 2025. https://www.washingtonexaminer.com/news/washington-secrets/3423973/trump-cheered-best-friend-of-animals-after-research-grants-nixed/.

[25]NIH. NIH to prioritize human-based research technologies. April 29, 2025. Accessed October 6, 2025. https://www.nih.gov/news-events/news-releases/nih-prioritize-human-based-research-technologies.

[26]U.S. Government Accountability Office (GAO). May, 2025. *Human organ-on-a-chip: Technologies offer benefits over animal testing but challenges limit wider adoption* (GAO-25-107335). Accessed November 5, 2025. https://www.gao.gov/products/gao-25-107335.

[27]FDA Modernization Act 2.0, Pub. L. No. 117-328, § 3209, 136 Stat. 4459, 5820 (2022). Accessed October 6, 2025. https://www.congress.gov/bill/117th-congress/senate-bill/5002.

[28]National Center for Advancing Translational Sciences. (2021, March). *NCATS strategic plan 2021-2026*. NIH. Accessed October 6, 2025. https://ncats.nih.gov/files/NCATS-Strategic-Plan-2021-2026.pdf

[29]PETA U.K. Research Modernization Deal. Accessed November 5, 2025. https://www.peta.org.uk/wp-content/uploads/2020/02/The-Research-Modernisation-Deal-EU-Report-PETA-UK-2020.pdf

Sincerely,

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