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THE ETHICAL  
TREATMENT  
OF ANIMALS

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December 10, 2025

Esra Erkal  
Executive Vice President, Global Communications  
Elsevier

Via e-mail: [E.Erkal@Elsevier.com](mailto:E.Erkal@Elsevier.com)

Dear Ms. Erkal,

Thank you for your August 20, 2025, response<sup>1</sup> to PETA U.S., PETA Australia, and Alliance for HOPE International's letter dated July 22, 2025,<sup>2</sup> regarding our request that Elsevier retract two scientifically flawed and irresponsible strangulation and traumatic brain injury (TBI) experiments on animals led by groups at Monash University and prohibit publication of similar experiments going forward.

It is troubling that Elsevier "conclude[s] that the studies in question were performed in compliance with relevant medical research guidelines and comply with [Elsevier's] policies,"<sup>3</sup> evidently on the basis of a printed ethics statement by the authors of the studies in question. Taking their word at face-value without opening an investigation by Elsevier's Research Integrity and Publishing Ethics team to examine our complaint makes a mockery of this whole process. And indeed, based on the information presented below, there is compelling reason to believe that the studies were neither compliant with ethical guidelines, specifically ARRIVE guidelines, nor the journals' policies.

**Based on the new information presented below, and other information provided in our July 22 letter, we reiterate our request that Elsevier: 1) fully retract these papers, and 2) prohibit publication of all strangulation, TBI, and forced swim test (FST) experiments on animals going forward.**

In your August 20 response, you state that Elsevier's publishing teams confirmed that the papers complied with Elsevier's publishing ethics policies, citing the "Hazards and human or animal subjects" section, which states: "If the work involves the use of animal or human subjects, the author should ensure that the manuscript contains a statement that all procedures were performed in compliance with relevant laws and institutional guidelines and that the appropriate institutional committee(s) have approved them."<sup>4</sup>

<sup>1</sup>Erkal, E. Esra Erkal Replies to PETA. PETA.org. September 25, 2025. Accessed September 25, 2025. <https://www.peta.org/wp-content/uploads/2025/09/2025-08-20-esra-erkal-to-peta-re-rat-strangulation.pdf>

<sup>2</sup>Pons, S. PETA to Elsevier Regarding Rat Strangulation Experiments. PETA.org. September 25, 2025. Accessed September 25, 2025. <https://www.peta.org/wp-content/uploads/2025/09/2025-07-22-retraction-letter-elsevier.pdf>

<sup>3</sup> Erkal 2025

<sup>4</sup> Publishing ethics: Elsevier Policy. www.elsevier.com. Accessed August 25, 2025. <https://www.elsevier.com/about/policies-and-standards/publishing-ethics>.

#### Entities

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

You then reproduce the statements from each paper where the authors state they have carried out the experiments in accordance with the relevant laws and ethical guidelines, including the ARRIVE guidelines, as confirmation of compliance with the above Elsevier policy language. You then conclude by stating that based on this evidence, the studies in question were performed in compliance with both the relevant ethical guidelines and Elsevier's policy. However, a simple assertion of compliance with relevant guidelines and policy is insufficient to rebut substantive allegations of violations, which we provided in our letter dated July 22 (along with new information presented below). No other evidence was provided by you to support the authors' compliance with the relevant ethical guidelines or Elsevier's policy.

Additionally, Elsevier's policy includes the following language later in the same "Hazards and human or animal subjects" section cited above, which indicates that in addition to writing a statement that they comply ethical guidelines, authors must also actually comply in practice with those guidelines: "For human subjects, the author should ensure that the work described has been carried out in accordance with The Code of Ethics of the World Medical Association (Declaration of Helsinki) for experiments involving humans. All animal experiments should comply with the ARRIVE guidelines..."<sup>5</sup>

In our July 22 letter, we highlighted multiple apparent failures of the authors of these studies to comply with ARRIVE guidelines, and consequently the policies of the respective journals they were published in. Based on the Elsevier policies referenced above, and, in your email, the apparent failures to comply with the ARRIVE guidelines are also evidence that studies are not compliant with Elsevier's policies. Additionally, the details of the apparent failures to adhere to ARRIVE guidelines, at least in the *Brain, Behavior, and Immunity* study, are corroborated by explanations provided by the corresponding author, Professor Sandy Shultz, himself. In a letter that Shultz wrote to that journal to respond to critiques from other advocacy organizations, Shultz attempted to justify why the study adheres to ARRIVE guidelines by providing explanations for each one.<sup>6</sup> In many cases, Shultz's explanations don't address the issue or are admissions of failure to adhere to the guidelines. Below is the relevant section we shared in our July 22 letter to you, *updated to include new information and responses to the author's attempted justifications*.

### **Rat Strangulation and TBI Experiments Appear to Violate Journals' Guidelines**

It appears the authors of the Monash rat strangulation and TBI experiments did not adhere to guidelines set by their respective journals. According to *Brain, Behavior, and Immunity*'s Guide for Authors, "All animal experiments should comply with the ARRIVE guidelines ... and the authors should clearly indicate in the manuscript that such guidelines have been followed."<sup>7</sup> Similarly, according to *The Journal of Pain*'s Guide for Authors, "The Journal of Pain requires the use of an appropriate reporting guideline when writing any manuscript... Use the ARRIVE guideline for research on animals in a lab."<sup>8</sup> In both cases, the authors clearly indicated that such guidelines were followed, stating, "Procedures were approved by the Alfred Medical Research and Education Precinct

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<sup>5</sup> *Ibid.*

<sup>6</sup> Shultz S. Shultz Reply to Animal Advocacy Claims. PETA.org. September 23, 2025. Accessed September 23, 2025. <https://www.peta.org/wp-content/uploads/2025/09/Shultz-Reply-to-Animal-Advocacy-Claims-original.pdf>.

<sup>7</sup> Elsevier Science Direct. *Brain, Behavior, and Immunity* Guide for Authors. Accessed February 18, 2025. <https://www.sciencedirect.com/journal/brain-behavior-and-immunity/publish/guide-for-authors>

<sup>8</sup> The Journal of Pain. Guide for Authors. Accessed May 13, 2025. <https://www.jpain.org/content/authorinfo>

Animal Ethics Committee and conducted in accordance with the ARRIVE guidelines..."<sup>9</sup> and "All procedures were carried out in accordance with ARRIVE guidelines..."<sup>10</sup> **However, on numerous occasions throughout the experiments, the authors apparently failed to adhere to the ARRIVE guidelines.**

There are 20 such guidelines, but the ARRIVE essential 10 guidelines are "the basic minimum to include in a manuscript. Without this information, readers and reviewers cannot assess the reliability of the findings."<sup>11</sup> Detailed below are instances in which the authors of the *Brain, Behavior, and Immunity* Monash rat strangulation experiment apparently failed to adhere to ARRIVE essential 10 guidelines:<sup>12</sup>

- ARRIVE Guideline 2b states: "Explain how the sample size was decided. Provide details of any a priori sample size calculation, if done."<sup>13</sup> The authors explained the sample size as based on a previous experiment that they conducted.<sup>14</sup> However, their explanation in the previous experiment only detailed why the animal group size was lower than intended due to exclusions from animal deaths, and did not explain why the original group size was the size that it was. In his response, Shultz states that he and his colleagues based the animal group sizes on prior, similar research due to the apparent novelty of their current research, and that they explained this rationale in the paper.<sup>15</sup> However, this rationale is *not* provided in the paper; instead, they only state that the group size was based on previous research.
- ARRIVE Guideline 3a states: "Describe any criteria used for including and excluding animals (or experimental units) during the experiment, and data points during the analysis. Specify if these criteria were established a priori. If no criteria were set, state this explicitly."<sup>16</sup> The authors did not describe any criteria used for excluding animals and they did not acknowledge that no criteria were set.
- ARRIVE Guideline 3b states: "For each experimental group, report any animals, experimental units or data points not included in the analysis and explain why. If there were no exclusions,

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<sup>9</sup> 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. [doi:10.1016/j.bbi.2024.09.030](https://doi.org/10.1016/j.bbi.2024.09.030).

<sup>10</sup> 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. [doi:10.1016/j.jpain.2024.104762](https://doi.org/10.1016/j.jpain.2024.104762).

<sup>11</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025. The ARRIVE guidelines 2.0. Accessed May 13, 2025. <https://arriveguidelines.org/arrive-guidelines>

<sup>12</sup> Sun et al. 2025.

<sup>13</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

<sup>14</sup> Shultz SR, Sun M, Wright DK, et al. Tibial fracture exacerbates traumatic brain injury outcomes and neuroinflammation in a novel mouse model of multitrauma. *J Cereb Blood Flow Metab.* 2015;35(8):1339-1347. [doi:10.1038/jcbfm.2015.56](https://doi.org/10.1038/jcbfm.2015.56)

<sup>15</sup> Shultz 2025.

<sup>16</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

state so.”<sup>17</sup> The authors did not describe any animals excluded from the analysis and they did not state that there were no exclusions. In his response, Shultz states, “No mortalities occurred due to the injuries therefore no rats were excluded from the study.”<sup>18</sup> As stated, this information was *not* provided in the published paper as required by the guideline.

- ARRIVE Guideline 4a states: “State whether randomisation was used to allocate experimental units to control and treatment groups. If done, provide the method used to generate the randomisation sequence.”<sup>19</sup> The authors did not state whether they used such randomization. In his response, Shultz states in his and his colleagues’ application to the animal ethics committee that the groups of animals would be randomized.<sup>20</sup> However, this information is not included in any published materials. He *admits* that due to an oversight they did not state that groups were randomized in the paper, therefore acknowledging that they failed to adhere to the guidelines. Lastly, even if they had included the term “randomly” in the sentence they intended to, they did *not* provide the method used to generate the randomization sequence as explicitly required by the guideline.
- ARRIVE Guideline 4b states: “Describe the strategy used to minimise potential confounders such as the order of treatments and measurements, or animal/cage location. If confounders were not controlled, state this explicitly.”<sup>21</sup> The authors did *not* describe any strategy to minimize potential confounders, and they did *not* state whether they controlled confounders. Shultz makes *no* reference to the lack of description of confounders in his response.<sup>22</sup>
- ARRIVE Guideline 5 states: “Describe who was aware of the group allocation at the different stages of the experiment (during the allocation, the conduct of the experiment, the outcome assessment, and the data analysis).”<sup>23</sup> The authors described blinding during the conduct of the experiment, however, they did *not* provide a description regarding blinding during allocation, outcome assessment, or data analysis. In his response, Shultz states that he and his colleagues described blinding during the conduct of their experiment, but they made *no* reference to blinding during allocation or data analysis.<sup>24</sup> He states that the post-mortem analyses were blinded, but *admits* that he and his colleagues did *not* describe this in their paper, therefore acknowledging that they did not adhere to the guidelines.

Additionally, detailed below are instances in which the authors of the *The Journal of Pain* Monash rat strangulation experiment apparently failed to adhere to ARRIVE essential 10 guidelines.<sup>25</sup>

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<sup>17</sup> *Ibid.*

<sup>18</sup> Shultz 2025.

<sup>19</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

<sup>20</sup> Shultz 2025.

<sup>21</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

<sup>22</sup> Shultz 2025.

<sup>23</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

<sup>24</sup> Shultz 2025.

<sup>25</sup> Sgro et. al. 2025.

- ARRIVE Guideline 3b states: "For each experimental group, report any animals, experimental units or data points not included in the analysis and explain why. If there were no exclusions, state so."<sup>26</sup> The authors did *not* state whether there were any exclusions.
- ARRIVE Guideline 5 states: "Describe who was aware of the group allocation at the different stages of the experiment (during the allocation, the conduct of the experiment, the outcome assessment, and the data analysis)."<sup>27</sup> The authors described blinding during the conduction of the experiment, however they did *not* provide a description regarding blinding during allocation, outcome assessment, or data analysis.

In November, a third experiment by Shultz and his colleagues was published in *Nature* affiliated *Molecular Psychiatry*, with nearly the same methods, but instead of strangling the rats once, the experimenters strangled the animals five times over five days.<sup>28</sup> They also put the animals through the FST. Notably, the authors made no mention of, and failed to adhere to, ARRIVE guidelines and instead doubled down on their cruel and flawed methodologies. Other, recent cases of scientific misconduct have received significant attention and eroded public trust in scientific institutions.<sup>29,30</sup> As a journal that "takes its duties of guardianship over the scholarly record extremely seriously,"<sup>31</sup> Elsevier should uphold its duties and take action to resolve this matter of social and scientific importance—specifically by retracting these papers and prohibiting the publication of all strangulation, TBI, and FST experiments on animals going forward.

You may contact me directly via e-mail at [SamuelP@peta.org](mailto:SamuelP@peta.org). Thank you for your attention to this important matter, and we look forward to your response.

Sincerely,



Samuel Pons, M.A.  
Special Projects Associate  
PETA U.S.



Mimi Bekhechi  
Senior Policy Advisor to  
PETA Australia

cc:     Laura Hassink  
          Managing Director, Journals

<sup>26</sup> The National Centre for the Replacement Refinement & Reduction of Animals in Research 2025.

<sup>27</sup> *Ibid.*

<sup>28</sup> Allen J, Sun M, Baker TL, et al. Psilocybin mitigates chronic behavioral and neurobiological alterations in a rat model of recurrent intimate partner violence-related brain injury. *Molecular Psychiatry*. Published online November 5, 2025. doi:10.1038/s41380-025-03329-x

<sup>29</sup> Pillai S. India's research crime is getting worse. scientists are gaming peer review system. *ThePrint*. March 3, 2025. Accessed September 25, 2025. <https://theprint.in/ground-reports/indias-research-crime-is-getting-worse-scientists-are-gaming-peer-review-system/2261884/>.

<sup>30</sup> Montgomery L, Bell E, Huang K. Academic Publishing is a multibillion-dollar industry. it's not always good for Science. *The Conversation*. March 25, 2025. Accessed September 25, 2025.

<https://theconversation.com/academic-publishing-is-a-multibillion-dollar-industry-its-not-always-good-for-science-250056>.

<sup>31</sup> Publishing ethics: Elsevier Policy. www.elsevier.com. Accessed August 25, 2025.  
<https://www.elsevier.com/about/policies-and-standards/publishing-ethics>.

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