



September 10, 2025

The Honorable Brooke Rollins  
Secretary of Agriculture  
U.S. Department of Agriculture

Dear Secretary Rollins:

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 worldwide—regarding the egregious waste of money paid by U.S. farmers to agricultural commodity research and promotion (R&P) boards specifically for cruel animal experiments, which are irrelevant to human health, widely recognized as scientifically unsound, not required by law, and demotivating consumers to buy American fruits and veggies. **Based on the information presented below, we ask that you use your authority under the Commodity Promotion, Research, and Information Act of 1996 to ban the use of R&P board assessment fees for animal experiments.**

R&P boards use a portion of farmers' annual mandatory assessment fees, established by the U.S. Department of Agriculture (USDA) and administered by its Agricultural Marketing Service (AMS), to pay for absurd and abusive tests on animals. Below are just some of these sickening tests funded by R&P boards:

U.S. Highbush Blueberry Council:

- Experimenters repeatedly starved mice, repeatedly took their blood, repeatedly injected them with a chemical that induces menopause, douched their vaginas, fed them a high-fat diet with blueberries, injected them with insulin, and killed and dissected them.<sup>1</sup>
- Experimenters fed rats blueberries, changed their cage mates daily, repeatedly restrained them in tubes smeared with cat food with a cat in the room to induce post-traumatic stress disorder–like symptoms in the rats, forced them to perform a stress-inducing behavioral test, and killed and dissected them.<sup>2</sup>
- Experimenters fed rats blueberries, restrained them in plastic tubes, rendered them cognitively impaired by irradiating them, forced them to

<sup>1</sup> Elks, C. M., Terrebbonne, J. D., Ingram, D. K., & Stephens, J. M. (2015). Blueberries improve glucose tolerance without altering body composition in obese postmenopausal mice. *Obesity*, 23(3), 573–580.

<sup>2</sup> Ebenezer, P. J., Wilson, C. B., Wilson, L. D., Nair, A. R., & Francis, J. (2016). The anti-inflammatory effects of blueberries in an animal model of post-traumatic stress disorder (PTSD). *PLoS One*, 11(9), e0160923.

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perform confusing and stress-inducing memory tasks, killed them by cutting off their heads, and dissected them.<sup>3</sup>

#### The Mushroom Council:

- Experimenters fed rats white button mushrooms and forced them to perform several stress-inducing motor and cognitive tests, such as walking on balance beams and rotating rods, and swimming through a water maze. Fourteen rats died or had to be killed early because of excessive weight loss from the stress.<sup>4</sup>
- Experimenters fed pigs white button mushrooms, repeatedly poked their anuses, took their blood, and killed and dissected them.<sup>5</sup>
- Experimenters fed genetically modified mice who were prone to atherosclerosis a high-fat diet with or without shiitake or portobello mushrooms, suffocated them to death, drained their blood, and dissected them.<sup>6</sup>

#### United Sorghum Checkoff Program:

- Experimenters fed rats sorghum bran and a chemical that induces colitis, and killed and dissected them.<sup>7,8</sup>

#### United Soybean Board:

- Experimenters injected mice with cancer cells, repeatedly injected them with an immunosuppressive drug and other substances, repeatedly force-fed them two plant ingredients, and killed and dissected them.<sup>9</sup>
- Experimenters fed genetically modified mice who were prone to cystic fibrosis a soy ingredient or a laxative, and killed and dissected them. Forty-nine animals died of the disease before they could be killed by the experimenters.<sup>10</sup>

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<sup>3</sup> Poulouse, S. M., Rabin, B. M., Bielinski, D. F., Kelly, M. E., Miller, M. G., Thanthaeng, N., & Shukitt-Hale, B. (2017). Neurochemical differences in learning and memory paradigms among rats supplemented with anthocyanin - rich blueberry diets and exposed to acute doses of 56Fe particles. *Life Sciences in Space Research*, 12, 16–23.

<sup>4</sup> Thangthaeng, N., Miller, M. G., Gomes, S. M., & Shukitt-Hale, B. (2015). Daily supplementation with mushroom (*Agaricus bisporus*) improves balance and working memory in aged rats. *Nutrition Research*, 35(12), 1079–1084.

<sup>5</sup> Solano-Aguilar, G. I., Jang, S., Lakshman, S., Gupta, R., Beshah, E., Sikaroodi, M., Vinyard, B., Molokin, A., Gillevet, P. M., & Urban, J. F. (2018). The effect of dietary mushroom *Agaricus bisporus* on intestinal microbiota composition and host immunological function. *Nutrients*, 10(11), 1721.

<sup>6</sup> Kim, S. H., Thomas, M. J., Wu, D., Carman, C. V., Ordovás, J. M., & Meydani, M. (2019). Edible mushrooms reduce atherosclerosis in *Ldlr*<sup>-/-</sup> mice fed a high-fat diet. *The Journal of Nutrition*, 149(8), 1377–1384.

<sup>7</sup> Ritchie, L. E., Sturino, J. M., Carroll, R. J., Rooney, L. W., Azcarate-Peril, M. A., & Turner, N. D. (2015). Polyphenol-rich sorghum brans alter colon microbiota and impact species diversity and species richness after multiple bouts of dextran sodium sulfate-induced colitis. *FEMS Microbiology Ecology*, 91(3), fiv008.

<sup>8</sup> Ritchie, L. E., Taddeo, S. S., Weeks, B. R., Carroll, R. J., Dykes, L., Rooney, L. W., & Turner, N. D. (2017). Impact of novel sorghum bran diets on DSS-induced colitis. *Nutrients*, 9(4), 330.

<sup>9</sup> Chakrabarti, M., & Ray, S. K. (2016). Anti-tumor activities of luteolin and silibinin in glioblastoma cells: Overexpression of miR-7-1-3p augmented luteolin and silibinin to inhibit autophagy and induce apoptosis in glioblastoma in vivo. *Apoptosis*, 21(3), 312–328.

<sup>10</sup> Lord, R., Fairbourn, N., Mylavarapu, C., Dbeis, A., Bowman, T., Chandrashekar, A., Banayat, T., Hodges, O. A., & AlNakkash, L. (2018). Consuming genistein improves survival rates in the absence of laxative in  $\Delta F508$ -CF female mice. *Nutrients*, 10(10), 1418.

- Experimenters repeatedly force-fed genetically modified mice who were prone to diabetes a soy ingredient, injected them with cancer cells, starved them for 15 hours, injected them with glucose and insulin, repeatedly took their blood, suffocated them to death, and dissected them.<sup>11</sup>

Hardworking U.S. farmers should not be forced to subsidize this waste. These assessments are not optional—they are mandatory fees that producers, handlers, processors, and importers must pay. The AMS is tasked with overseeing how this money is spent, and it should ensure that every dollar goes toward efforts that meaningfully promote agricultural products, not toward outdated, expensive, and pointless animal tests that do nothing to benefit public health or boost commodity markets.

In 2017, during President Trump’s first administration, the U.S. Government Accountability Office stated that in the prior year, during President Obama’s administration, “USDA assessment fees totaled over \$885 million.”<sup>12</sup> Any use of farmers’ assessment fees for junk science animal experiments goes directly against President Trump’s recent historic initiatives to cut waste, fraud, and abuse across the federal government by ending animal tests.<sup>13</sup> For example, key federal science and regulatory agencies in President Trump’s administration have openly acknowledged the failures of animal testing and are moving away from it, in alignment with PETA’s Research Modernization NOW strategic framework for human-relevant science.<sup>14</sup>

- *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."<sup>15</sup>
- *The National Institutes of Health (NIH)*: The NIH, the world's largest public funder for biomedical research<sup>16</sup>— announced a major new initiative on April 29, 2025, "to expand innovative, human-based science while reducing animal use in research."<sup>17</sup> On May 4, 2025, the agency closed its in-house beagle lab, where dogs were used in sepsis and pneumonia experiments.<sup>18</sup> On May 23, 2025, the agency also terminated funding for

<sup>11</sup> Huang, G., Xu, J., & Guo, T. L. (2019). Isoflavone daidzein regulates immune responses in the B6C3F1 and non-obese diabetic (NOD) mice. *International Immunopharmacology*, 71, 277–284.

<sup>12</sup> U.S. Gov’t Accountability Off. Agricultural Promotion Programs: USDA Could Build on Existing Efforts to Further Strengthen Its Oversight. November 2017. <https://www.gao.gov/assets/gao-18-54.pdf>

<sup>13</sup> PETA. The Trump Administration’s Achievements for Science and Animals. July 9, 2025. <https://www.peta.org/misc/the-trump-administrations-achievements-for-science-and-animals/>

<sup>14</sup> PETA. Research Modernization NOW. November 2024. <https://www.peta.org/wp-content/uploads/2025/01/Research-Modernization-NOW-Biomedical.pdf>

<sup>15</sup> US FDA. FDA Announces Plan to Phase Out Animal Testing Requirement for Monoclonal Antibodies and Other Drugs. April 10, 2025. <https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-mono-clonal-antibodies-and-other-drugs>

<sup>16</sup> NIH. Grants & funding. January 21, 2025. <https://www.nih.gov/grants-funding>.

<sup>17</sup> NIH. NIH to prioritize human-based research technologies. April 29, 2025. <https://www.nih.gov/news-events/news-releases/nih-prioritize-human-based-research-technologies>

<sup>18</sup> Fox News. NIH closes experimentation labs accused of brutally killing thousands of beagles for 40+ years. July 15, 2025. <https://www.foxnews.com/politics/nih-closes-experimentation-labs-accused-brutally-killing-thousands-beagles-40-years>.

Harvard experiments that involved sewing shut the eyes of baby monkeys and subjecting them to visual deprivation.<sup>19</sup> These studies were exposed by PETA in 2022.<sup>20</sup> On May 28, 2025, the NIH launched a new autism research funding opportunity that explicitly excludes animal experiments.<sup>21</sup> 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.<sup>22</sup> 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."<sup>23</sup> 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.<sup>24,25</sup>

As the federal government is moving increasingly toward more ethical, economical, and effective research methods without the use of animals, the AMS must do the same with the programs it oversees. The Commodity Promotion, Research, and Information Act of 1996 mandates that assessment fees be used only for initiatives "vital to the welfare" of those engaged in the production and marketing of commodities and to the broader economy.<sup>26</sup> Tormenting and killing animals in laboratories in irrelevant experiments funded by R&P boards offers no benefit to farmers or the general public and plainly violates the spirit of the law.

Moreover, these experiments contradict government standards such as the U.S. Public Health Service's *Guide for the Care and Use of Laboratory Animals* and the *U.S. Government Principles for the Utilization and Care of Vertebrate Animals*.<sup>27,28</sup> These standards emphasize reducing or replacing animal use in experiments, and yet, R&P boards have continued to fund

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<sup>19</sup> NIH [@NIH]. [IH has terminated funding at Harvard University for studies that included sewing the eyes of young monkeys shut....] [Post]. X. May 29, 2025. <https://x.com/NIH/status/1928136701429284991>.

<sup>20</sup> PETA. Harvard loses infant monkey torture funds. May 23, 2025. <https://www.peta.org/news/harvard-loses-infant-monkey-torture-funds/>.

<sup>21</sup> NIH. Autism Data Science Initiative: Funding opportunities. June 30, 2025. <https://dpcpsi.nih.gov/autism-data-science-initiative/funding-opportunities>.

<sup>22</sup> People for the Ethical Treatment of Animals. NIH and FDA urged to adopt non-animal toxicology test methods. n.d. <https://www.peta.org/news/nih-fda-non-animal-toxicology-test-methods/>.

<sup>23</sup> U.S. Food and Drug Administration. FDA & NIH workshop on reducing animal testing [Video]. YouTube. July 10, 2024. <https://www.youtube.com/embed/FUWQ1V8DI-c?feature=oembed&enablejsapi=1&origin=https%3A%2F%2Fwww.peta.org>.

<sup>24</sup> National Institute of Allergy and Infectious Diseases. 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). July 9, 2025. <https://grants.nih.gov/grants/guide/notice-files/NOT-AI-25-040.html>.

<sup>25</sup> National Institutes of Health. PAR-23-225: HIV/AIDS Scholars Using Nonhuman Primate (NHP) Models Program (K01 Independent Clinical Trial Not Allowed). 2023. <https://grants.nih.gov/grants/guide/pa-files/PAR-23-225.html>.

<sup>26</sup> Commodity Promotion, Research, and Information Act of 1996, 7 U.S.C. §§ 7411-7425. [https://www.nodpa.com/files/checkoff\\_Generic\\_regulations\\_on\\_check-off.pdf](https://www.nodpa.com/files/checkoff_Generic_regulations_on_check-off.pdf)

<sup>27</sup> Albus, U. (2012). *Guide for the care and use of laboratory animals* (8th edition). The National Academies Press

<sup>28</sup> NIH OLAW. U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training. March 30, 2018. <https://olaw.nih.gov/policies-laws/gov-principles.htm>

animal testing even when non-animal alternatives exist. These tests are not required by law, are scientifically indefensible, and are a poor use of farmers' hard-earned money.

Several R&P boards have recognized this and taken action. After more than 85,000 consumers contacted the Hass Avocado Board, it adopted a new public policy stating that it “does not support, fund, or conduct animal research.”<sup>29</sup> Similarly, in response to PETA’s public campaigns,<sup>30,31</sup> the National Mango Board confirmed it “does not fund research studies involving animals ... and has no plans to do so in the future,”<sup>32</sup> and the National Watermelon Promotion Board explicitly prohibits “uncontrolled intervention studies, animal studies or in vitro studies.”<sup>33</sup>

Every dollar wasted on animal testing is a dollar that could be used to support producers, expand markets, or fund research that directly benefits commodity promotion. The AMS is responsible for ensuring that assessment funds are spent wisely and effectively, and it should immediately prohibit the use of these funds for any animal testing. We previously appealed to the Biden administration in 2021<sup>34</sup> and 2024<sup>35</sup> regarding this issue, yet they failed to resolve it. We hope you will take decisive action and do right by farmers, consumers, and animals.

May I please hear from you by October 9, 2025, regarding this important matter? I can be reached at [FrancesC@peta.org](mailto:FrancesC@peta.org). Thank you, and I look forward to your response.

Sincerely yours,



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<sup>29</sup> Avocado Nutrition Center. Research Opportunities. n.d. <https://research.loveonetoday.com/research-opportunities/>

<sup>30</sup> PETA. Victory! National Mango Board’s Seedy Tests on Rats and Mice End Following Pressure From PETA. August 13, 2024. <https://www.peta.org/news/national-mango-board-ends-tests-on-rats-and-mice/>

<sup>31</sup> PETA. Victory! National Watermelon Board Ends Rotten Animal Tests After PETA Push. December 19, 2024. <https://www.peta.org/news/victory-national-watermelon-board-ends-rotten-animal-tests/>

<sup>32</sup> Mango.org. FAQs. n.d. <https://www.mango.org/frequently-asked-questions/>

<sup>33</sup> Watermelon.org. Nutrition Research. n.d. <https://www.watermelon.org/audiences/industry/research/nutrition-research/>

<sup>34</sup> PETA, letter to Thomas Vilsack. March 22, 2021. <https://www.peta.org/wp-content/uploads/2021/03/2021-PETA-to-USDA-re-AMS-animal-testing.pdf>

<sup>35</sup> PETA, letter to Jennifer Porter and Christopher Purdy. April 10, 2024. <https://www.peta.org/wp-content/uploads/2024/03/2024-04-10-usda-checkoffs-petition-for-rulemaking.pdf>