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May 6, 2026

The Honorable Pete Hegseth
Secretary of War
c/o Ricky Buria, Chief of Staff to the Secretary of War
The U.S. Department of War

Via e-mail

Dear Secretary Hegseth:

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—regarding the urgent need to cut waste, fraud, and abuse at the Pentagon, specifically concerning gruesome and ongoing animal testing involving more than $57 million in public funds. At a time of intensified scrutiny over the soaring costs of war and growing calls to rein in Pentagon spending, PETA respectfully offers a proposal that would reduce fiscal waste, modernize military science, and advance troop health.

Based on the enclosed supplemental brief, we request that you initiate a comprehensive audit of *all* contracts, contract indefinite delivery vehicles (IDVs), grants, direct payments, loans, and other awards issued across the entire Department of War (DOW), aimed at rooting out waste, fraud, and abuse in cruel and outdated animal experimentation. As an initial step, we ask that you align the DOW research, development, testing, evaluation (RDT&E), and training programs with the larger federal transition away from the use of animals in experimentation, starting with banning the following:

1) **U.S. Navy decompression sickness/illness and oxygen toxicity tests on animals;**[1]
2) **U.S. Army weapon-wounding tests on dogs, cats, non-human primates, marine mammals, and all other animals;**[2] **and,**
3) **DOW-funded animal experiments at foreign institutions.**[3]

Under President Trump's administration, several U.S. government bodies—including the Centers for Disease Control and Prevention (CDC),[4]

[1] People for the Ethical Treatment of Animals. PETA to Navy: Ban the Use of Animals in Cruel Decompression Tests. Accessed March 6, 2026. https://support.peta.org/page/43766/action/1?locale=en-US.
[2] PETA. Urge the U.S. Army to Shield All Animals From Weapon-Wounding Tests. Accessed March 6, 2026. https://support.peta.org/page/49917/action/1?locale=en-US.
[3] DOW. ACURO policy on work conducted in foreign countries. Accessed July 9, 2025. https://mrdc.health.mil/assets/docs/orp/acuro/ACURO_policy_on_work_in_foreign_countries_final.pdf.
[4] Grimm D. November 21, 2025. Exclusive: CDC to end all monkey research. *Science*. https://www.science.org/content/article/exclusive-cdc-end-all-monkey-research.

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

Environmental Protection Agency (EPA),[5] Food and Drug Administration (FDA),[6] National Institutes of Health (NIH),[7,8] U.S. Navy,[9] and others—have announced historic plans to phase out animal testing,[10,11] in alignment with PETA's Research Modernization NOW strategic framework for transforming research toward superior human-relevant methods.[12] We ask the Pentagon to emulate the progress the Trump administration has made in ending animal testing across the government. Redirecting funds away from cruel, irrelevant and wasteful experiments on animals would free limited taxpayer dollars for modern technologies that better support military readiness while responding directly to public concerns about the true costs of war.

You can contact me at MaggieW@peta.org. We appreciate your consideration of this important issue and look forward to your response.

Sincerely,

Maggie Wiśniewska, Ph.D.
Science Policy Advisor - International Laboratory Methods
Laboratory Investigations Department

Enclosure: Supplemental Brief: Cutting Waste, Fraud, and Abuse in Pentagon Animal Testing

cc: Office of the Under Secretary of War, Research and Engineering, DOW
Defense Press Operations Office in the Pentagon, DOW
Christopher Garver, Deputy Director, Defense Press Operations, DOW
Susan (Sue) Gough, Strategic Planner & Spokesperson (COL(R)), DOW
Kingsley Wilson, Pentagon Press Secretary, DOW

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[5] EPA January 26, 2026. *ICYMI: Administrator Zeldin gets EPA back on track to eliminate animal testing after Biden admin halted phase out*. https://www.epa.gov/newsreleases/icymi-administrator-zeldin-gets-epa-back-track-eliminate-animal-testing-after-biden.
[6] 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-monoclonal-antibodies-and-other-drugs.
[7] 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
[8] NIH. March 18, 2026. *NIH invests $150 million in human-based research to reduce use of animal models*. https://www.nih.gov/news-events/news-releases/nih-invests-150-million-human-based-research-reduce-use-animal-models.
[9] Fox News. *Navy halts dog and cat experiments; PETA writes Hegseth about US taxpayer-funded animal tests abroad*. May 31, 2025. *Fox News*. https://www.foxnews.com/us/navy-halts-dog-cat-experiments-peta-writes-hegseth-about-us-taxpayer-funded-animal-tests-abroad.
[10] PETA. *The Trump administration's achievements for science and animals*. Accessed July 14, 2025. https://www.peta.org/misc/the-trump-administrations-achievements-for-science-and-animals/.
[11] Bedard P. May 28, 2025. Trump cheered as 'best friend of animals' after research grants nixed. Washington Examiner. Accessed May 29, 2025. https://www.washingtonexaminer.com/news/washington-secrets/3423973/trump-cheered-best-friend-of-animals-after-research-grants-nixed/.
[12] PETA. Research Modernization NOW. April 2026. https://science.peta.org/.

Supplemental Brief:
Cutting Waste, Fraud, and Abuse in Pentagon Animal Testing

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May 6, 2026

The Navy's Decompression Sickness and Oxygen Toxicity Tests on Animals

In 2023, FOX News reported that PETA swayed the Navy to stop funding "gruesome decompression experiments" on sheep at the University of Wisconsin-Madison, sparing them from spinal cord injury, cardiovascular collapse, and paralysis.[13] The action followed an appeal to then-Navy Secretary Carlos Del Toro from PETA and retired Rear Adm. Marion Balsam, former commander of Naval Medical Center Portsmouth, calling for an end to such animal testing.[14,15]

While the Trump administration has now banned the Navy's use of dogs and cats in testing, the Navy continues to conduct and fund decompression sickness and oxygen toxicity tests on

[13]Arias P. PETA claims victory for Navy ending 'gruesome' testing on sheep. February 2, 2023. FOX News. Accessed March 6, 20256. https://www.foxnews.com/us/peta-claims-victory-navy-ending-gruesome-testing-sheep.
[14] Letter from Pons S. and Balsam MJ. to the Secretary of the Navy Del Toro C. regarding animal testing. June 8, 2022. Accessed March 6, 2026. https://www.peta.org/wp-content/uploads/2022/08/2022-06-08-letter-to-usn-re-dcs-tests.pdf.
[15] PETA. PETA to Navy: Stop using animals in cruel decompression tests. PETA. Accessed March 6, 2026. https://support.peta.org/page/43766/action/1?locale=en-US.

animals. In these tests, experimenters lock pigs, rats, and other animals in hyperbaric chambers and expose them to crushing levels of atmospheric pressure before they're killed. The tests are useless to humans because of the numerous physiological differences between species.

For example, in disturbing public records obtained by PETA,[16] experimenters at the Naval Medical Research Command sliced open baby pigs, implanted devices in them, and locked them in high-pressure chambers for up to eight days before killing them. Experimenters administered a drug to a pig, inducing a severe escalation in body temperature and muscle contractions before killing the animal. Potentially faulty sedatives may have prolonged the pig's suffering. Another pig thrashed and suffered for up to four hours, apparently due to a negative reaction to a drug, and was ultimately killed. In addition, a rat suffocated to death after an equipment malfunction, and the experimenter failed to report the incident for 23 days.

The Navy has wasted *nearly $3 million in taxpayer dollars* since 2022 on decompression sickness and oxygen toxicity tests on animals at four universities, as we referenced in our May 29, 2025, letter to you.[17] Below are two of these cruel Navy-funded experiments that are still active, totaling *nearly $1 million in taxpayer dollars*:

Location	University of California, San Diego
Grant Number	N000142312543[18]

[16] Public records release to PETA regarding animal research at the Naval Medical Research Command. Accessed March 6, 2026. https://www.peta.org/wp-content/uploads/2024/04/nmrc-records.pdf.
[17] Letter from Wiśniewska M to the Secretary of War, Pete Hegseth, asking to end animal testing at DOW. May 29, 2025. Accessed March 3, 2026. https://www.peta.org/wp-content/uploads/2025/05/2025-05-29-letter-to-secdef-and-secnav-re-ending-animal-tests.pdf.
[18] Project Grant N000142312543—Biophysical drivers of decompression tolerance in cell membranes. Award profile grant summary. USA Spending.gov. Accessed March 6, 2026. https://www.usaspending.gov/award/ASST_NON_N000142312543_1700.

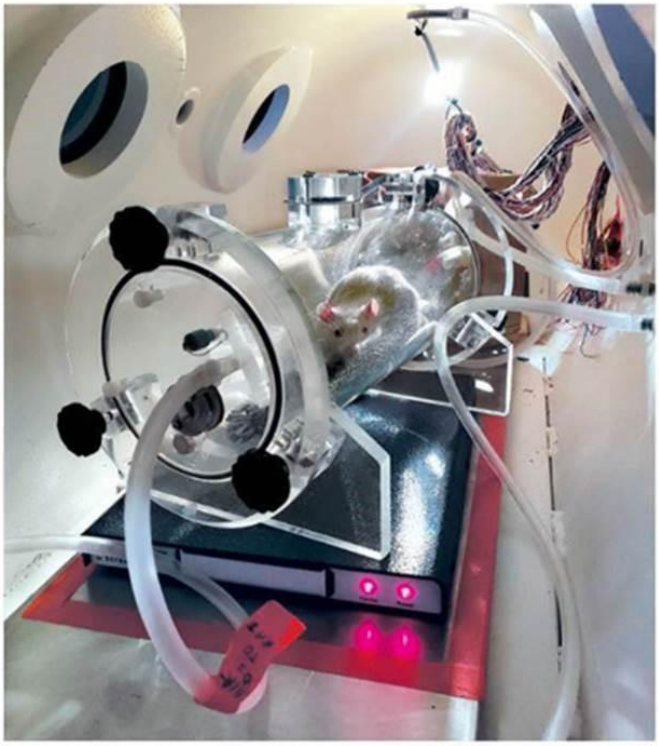
Funding Office	Office of Naval Research
Dates	June 1, 2023 –May 31, 2026
Obligated Amount	$474,140.00
Summary	Experimenter Peter Lindholm subjects rats to painful and possibly deadly tests—locking the animals in pressure chambers, forcing them to inhale radioactive gas, and electroshocking them if they fail to run on treadmills—purportedly to study nitrogen gas uptake and excretion during simulated diving. He also proposed tests on sheep without prior approval.[19]
Critique	Cardiovascular and respiratory hemodynamics of rats drastically differ from those of humans. A rat's high metabolic rate (which may result in rapid processing of inert gases) renders the data practically useless for predicting human diving physiology.[20]

Location	University of South Florida
Grant Number	N000142312717[21]
Funding Office	Office of Naval Research
Dates	July 1, 2023 – June 30, 2026
Obligated Amount	$525,387.00
Summary	Experimenter Jay Dean conducts invasive and painful procedures on rats to purportedly mitigate oxygen toxicity in the central nervous system. He induces seizures in the animals, without providing pain relief, and implants recording devices in their abdomens with wires placed on their backs and necks and electrodes fixed to their skulls. The rats are ultimately killed.[22]
Critique	As rodents and humans have fundamentally different metabolic rates,[23] experimenters induce seizures at hyperbaric pressures that exceed actual diver exposures, rendering rats and other animals to be poor predictors of human clinical outcomes.[24]

For your reference, here is a photo of one of the doomed animals locked in a hyperbaric chamber at the University of South Florida, where Navy-funded experimenter Jay Dean supposedly uses

[19] Letter from Swaminathan S. to President Khosla PK. regarding animal testing at the University of California-San Diego funded by the U.S. Navy. July 20, 2023. Accessed March 5, 2026. https://www.peta.org/wp-content/uploads/2023/07/2022-07-20-letter-to-ucsd-re-navy-decompression-viv.pdf.
[20] Fahlman A. Allometric scaling of decompression sickness risk in terrestrial mammals; cardiac output explains risk of decompression sickness. *Sci Rep.* 2017: 7, 40918. https://doi.org/10.1038/srep40918.
[21] Project Grant N000142312717—Seizure genesis in CNS oxygen toxicity: animal studies. Award profile grant summary. USA Spending.gov. Accessed March 9, 2026. https://www.usaspending.gov/award/ASST_NON_N000142312717_1700.
[22] Letter from Swaminathan S. to President Law RF. regarding animal testing at the University of South Florida funded by the U.S. Navy. July 20, 2023. Accessed March 6, 2026. https://www.peta.org/wp-content/uploads/2023/07/2022-07-20-letter-to-usf-re-navy-decompression-viv.pdf.
[23] Fahlman. 2017.
[24] Dean JB, Stavitzski NM. The O2-sensitive brain stem, hyperoxic hyperventilation, and CNS oxygen toxicity. *Front Physiol*. 2022: 13:921470. doi: 10.3389/fphys.2022.921470.

them to study oxygen toxicity in humans even though superior, human-relevant, animal-free methods are widely available:



Last year, more than 100 Navy veterans joined PETA in writing to top Navy brass urging the military branch to sink these wasteful and irrelevant tests on animals.[25]

Based on the information we have presented, we urge you to ban the Navy's decompression sickness/illness and oxygen toxicity experiments on animals.

The Army's Weapon-Wounding Tests on Animals

In 2020, the New York Post reported PETA's finding that the U.S. Army Medical Research & Development Command (USAMRDC)—now administered by the Defense Health Agency (DHA)—quietly overturned decades of precedent by issuing Policy 84,[26,27] which had explicitly permitted the use of dogs, cats, monkeys, and marine animals "to inflict wounds upon using a weapon."[28] Until recently, Policy 84 appeared under question 41 on the USAMRDC's frequently

[25] Letter from Swaminathan S. to the Secretary of Defense Austin LJ III and the Secretary of the Navy Del Toro C. regarding animal testing funded by the U.S. Navy. April 9, 2024. Accessed March 6, 2026. https://www.peta.org/wp-content/uploads/2024/04/2024-04-09-letter-to-sec-navy-sec-def-re-nmrc-dcs-dci.pdf.
[26] Doombos C. Army secretly allows shooting dogs, cats for research. September 30, 2022. The New York Post. Accessed March 5, 2026. https://nypost.com/2022/09/30/army-secretly-allows-shooting-dogs-cats-for-research/.
[27] Doombos C. Like cats and dogs: PETA, Army in battle over animal wounding research. November 25, 2022. New York Post. Accessed March 6, 2026. https://nypost.com/2022/10/10/like-cats-and-dogs-peta-army-in-battle-over-animal-wounding-research/.
[28] PETA. USAMRDC Policy 84, Animal Research and Medical Training Involving Wounding. February 13, 2020. Accessed March 3, 2026. https://www.peta.org/wp-content/uploads/2023/03/MRDC-Policy-84-Wounding.pdf.

asked questions website (see archived version in footnote).[29] Yet apparently, in December 2024, USAMRDC removed any mention of Policy 84 from this website (see current version in footnote).[30] In December 2025, DHA confirmed to PETA that USAMRDC's Policy 84 has been rescinded,[31] but concerningly there has been no new explicit ban on weapon-wounding tests on animals.

In reply to PETA's request for public records on weapon-wounding tests on animals, the Army, during the Biden administration, confirmed at least one such test protocol but claimed this is "classified … in the interest of national defense or foreign policy."[32] Also, in 2023, according to one former intelligence official and a current U.S. official at that time, the Pentagon reportedly recently tested pulsed radio frequency sources (a type of directed energy weapon) on primates to try to determine links to "anomalous health incidents" associated with Havana Syndrome.[33]

There are precedents for ending certain Army-funded weapon wounding testing on animals. In 2023, after hearing from PETA, the Army ended its $750,000 grant for a brain-damaging weapon-wounding test on ferrets at Wayne State University more than six months ahead of schedule, sparing these animals radio wave bombardment to study human Havana Syndrome.[34,35]

Recent media investigations reveal that the Pentagon has reportedly acquired a black-market directed-energy weapon (DEW) and is actively irradiating animals—including rats and sheep—in attempts to replicate symptoms associated with Havana Syndrome.[36] This bombardment of animals with a DEW is cruel and scientifically irrelevant to humans. Unlike human brains, which are highly folded and grooved (gyrencephalic), rat brains are entirely smooth (lissencephalic). This fundamental neuroanatomical difference alters how electromagnetic energy and radio waves penetrate, scatter, and damage the tissue. Consequently, irradiating rodents in attempts to model Havana Syndrome in humans yields data patterns that do not inform the care of human patients.[37]

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[29] Wayback Machine. USAMRDC ACURO Submission FAQ (archived November 28, 2024). Accessed March 6, 2026. https://web.archive.org/web/20241128172315/https:/mrdc.health.mil/index.cfm/collaborate/research_protections/acuro/submission_faq.

[30] USAMRDC. ACURO Submission FAQs. April 1, 2026. Accessed April 20, 2026. https://mrdc.health.mil/index.cfm/resources/research_protections/acuro/submission_faq.

[31] Smith D. Letter from DHA to PETA. December 4, 2025. Accessed March 3, 2026. https://www.peta.org/wp-content/uploads/2026/02/Defense-Health-Agency-Response-to-PETA.pdf.

[32] Letter from Harris AM to Flaugher K. Response letter to FOIA request. May 2, 2022, Accessed March 9, 2026. https://www.peta.org/wp-content/uploads/2022/09/2022-07-15-denied.pdf.

[33] Seligman L. March 9, 2023. The Pentagon is funding experiments on animals to recreate 'Havana Syndrome'. *Politico*. Accessed May 29, 2025. https://www.politico.com/news/2023/03/09/pentagon-funding-experiments-animals-havana-syndrome-0008639.

[34] Ward A. and Berg M. November 16, 2023. Why bin Laden's letter went viral on TikTok. *Politico*. Please see the section titled DOD Cancels 'Havana Syndrome' Grant. Accessed March 4, 2026. https://www.politico.com/newsletters/national-security-daily/2023/11/16/why-bin-ladens-letter-went-viral-on-tiktok-00127618.

[35] PETA. November 16, 2023. Urge the U.S. Army to Shield ALL Animals From Weapon-Wounding Tests. *PETA*. Accessed March 6, 2026. https://support.peta.org/page/49917/action/1?locale=en-US.

[36] Seligman. March 9, 2023. *Politico*.

[37] *Ibid.*

There has been recent bipartisan interest from Congress in banning DOW's funding of such weapon-wounding tests on animals.[38] Also, in 2024, more than 250 Army veterans joined PETA in writing to Army leadership urging a ban on these cruel and unreliable experiments.[39]

The DOW has wasted *nearly $35 million in taxpayer dollars* since 2021 on weapon-wounding tests on animals at nine institutions. Below are nine inhumane DOW-funded and active weapon-wounding experiments on animals that are irrelevant to troop health:

Location	McLean Hospital, Belmont, MA, USA
Grant Number	HDTRA12210024[40]
Funder	Defense Threat Reduction Agency (DTRA)
Dates	July 6, 2022 – July 5, 2027
Obligated Amount	$16,175,080
Summary	Experimenter Rajeev Desai poisons rats with chemical weapon analogues to purportedly study cognitive decline. He exposes animals to neurotoxic agents—including rivastigmine, physostigmine, and the organophosphate metrifonate—deliberately inducing neurochemical dysregulation and cognitive impairment in attempts to identify countermeasures.
Critique	Unlike humans, rodents possess high levels of carboxylesterase in their plasma, which acts as a "bioscavenger" that binds to and detoxifies organophosphates and carbamates before they can reach the brain. This alters the chemicals' toxicokinetic profiles, rendering results from rats as poorly predictive of human central nervous system toxicity and efficacy.[41,42]

[38] U.S. House of Representatives. June 20, 2024. Amendment to Rules Committee Print 118–: None of the funds made available by this Act may be used to purposefully wound dogs, cats, primates, or marine mammals for research purposes [Amendment offered by Mr. Buchanan of Florida; Submitted for consideration as part of the Department of Defense Appropriations Act, 2025 (H.R. 8774)]. Accessed March 4, 2026. https://amendments-rules.house.gov/amendments/BUCHAN_114_xml240620093338048.pdf.

[39] Letter from Wiśniewska M. to the Secretary of the Army Wormuth CE. Regarding weapons wounding tests on animals. November 11, 2024. Accessed March 9, 2026. https://www.peta.org/wp-content/uploads/2025/01/2024-11-14-letter-to-sec-army-w-army-vets-to-ban-weapons-wounding-on-animals.pdf.

[40] Project Grant HDTRA12210024—Assessing the Impact of Acetylcholinesterase (AChE) Inhibition on Cognition and Brain Neurochemistry. Award profile grant summary. DTIC. Accessed March 2, 2026. https://dtic.dimensions.ai/details/grant/grant.13038382.

[41] Marrero-Rosado BM, Stone MF, de Araujo Furtado M, Schultz CR, Cadieux CL, Lumley LA. Novel Genetically Modified Mouse Model to Assess Soman-Induced Toxicity and Medical Countermeasure Efficacy: Human Acetylcholinesterase Knock-in Serum Carboxylesterase Knockout Mice. Int J Mol Sci. 2021 Feb 14;22(4):1893. doi: 10.3390/ijms22041893. https://pubmed.ncbi.nlm.nih.gov/33672922/.

[42] Duysen EG, Koentgen F, Williams GR, Timperley CM, Schopfer LM, Cerasoli DM, Lockridge O. Production of ES1 plasma carboxylesterase knockout mice for toxicity studies. Chem Res Toxicol. 2011 Nov 21;24(11):1891-8. doi: 10.1021/tx200237a. https://pubmed.ncbi.nlm.nih.gov/21875074/.

Location	University of Colorado Denver, Denver, CO, USA
Grant Number	Award #: HT9425-23-2-0008; Proposal #: BA220027[43]
Funder	Congressionally Directed Medical Research Programs (CDMRP)
Dates	May 15, 2023 – September 14, 2026
Obligated Amount	$1,182,084
Summary	Experimenter Vikhyat Bebarta subjects pigs to incapacitating doses of drugs and nerve agents (chemical warfare agents) to induce rapid apnea, and he inflicts traumatic injuries by using a bolt gun to fracture the animals' femurs and bleed them up to 35% of their total blood volume to simulate battlefield trauma.
Critique	As major interspecies differences exist in enzymes used for metabolizing synthetic opioids (e.g., CYP3A29), toxicokinetic data in pigs is unreliable for predicting response in humans.[44,45]

Location	Johns Hopkins University, Baltimore, MD, USA
Grant Number	Award #: HT9425-24-1-0789; Proposal #: VR230116[46]
Funder	CDMRP
Dates	September 1, 2024 – August 31, 2027
Obligated Amount	$1,473,430
Summary	Experimenter Amer Riazuddin exposes rabbits' and monkeys' eyes to pulses from lasers (which he labels as "directed-energy weapons")[47] that destroy the corneal endothelium and cause eye swelling and vision loss—purportedly to test stem cell injections for corneal edema—after which the animals are killed.
Critique	Unlike humans, whose mature corneal endothelial cells are arrested in the cell cycle and cannot regenerate *in vivo*, rabbits possess a highly proliferative corneal endothelium that rapidly divides to repair traumatic damage. Thereby, rabbit corneas will spontaneously heal from severe endothelial injuries on their own, rendering results from these animals to be poor predictors of therapeutic efficacy in human clinical applications.[48]

[43] Project Grant HT9425-23-2-0008—Dual threat combat injury: optimizing combat casualty care for combined trauma/shock and chemical attack (C4TraCe): A translational combat-relevant model. Award profile grant summary. DTIC. Accessed March 2, 2026. https://dtic.dimensions.ai/details/grant/grant.13740499.

[44] Thörn H, Lundahl A, Schrickx JA, Dickinson PA, Lennernäs H. Drug metabolism of CYP3A4, CYP2C9 and CYP2D6 substrates in pigs and humans. *Eur J Pharm Sci.* 2011: 43(3), 89-98. https://doi.org/10.1016/j.ejps.2011.03.008.

[45] Skaanild MT. Porcine cytochrome P450 and metabolism. *Basic Clin Pharmacol & Toxicol.* 2006: 98(4), 349-355. https://doi.org/10.1111/j.1742-7843.2006.pto_363.x.

[46] Project Grant HT9425-24-1-0789—Pluripotent stem cell-derived corneal endothelial cells for treatment of combat laser-induced corneal edema and vision restoration. Award profile grant summary. DTIC. Accessed March 2, 2026. https://dtic.dimensions.ai/details/grant/grant.14075321.

[47] *Ibid*.

[48] Pei W, Chen J, Wu W, Wei W, Yu Y, Feng Y. Comparison of the rabbit and human corneal endothelial proteomes regarding proliferative capacity. *Experim Eye Res, 2021: 209*, 108629. https://doi.org/10.1016/j.exer.2021.108629.

Location	Uniformed Services University of the Health Sciences, United States, Baltimore, MD, USA
Grant Number	Award #: HT9425-24-1-0979; Proposal #: MB230042[49]
Funder	CDMRP
Dates	August 15, 2024 – August 14, 2026
Obligated Amount	$1,851,874
Summary	Experimenter Regina Day subjects mice to high-dose X-ray radiation to induce severe cutaneous radiation injury—causing inflammation, ulceration, fibrosis, and a loss of regenerative capacity—motivated by her assertion that "the global growth in nuclear power generation and proliferation of nuclear weapons has increased the risk for both civilian and combat-related radiation exposures."[50] She then injects the animals with engineered "Cargocytes" to purportedly reduce inflammation and promote wound healing, and to inform human biology and medicine. The animals are likely killed at the end of the tests.
Critique	Mouse skin differs fundamentally from human skin in structure and healing mechanisms, including the presence of the panniculus carnosus muscle that enables rapid wound contraction not seen in humans.[51] In addition, large-scale genomic analyses show that inflammatory responses in mice often fail to accurately reflect human biology.[52] As a result, these limitations suggest that findings from mouse experiments may not reliably translate to human patients, and more clinically-relevant results are likely to come from increasingly sophisticated animal-free methods that are widely available.[53,54]

[49] Project Grant HT9425-24-1-0979—Cargocytes as Countermeasures for Radiation-Induced Dermatitis. DTIC. Accessed April 1, 2026. https://dtic.dimensions.ai/details/grant/grant.14273422.
[50] *Ibid*.
[51] Zomer HD, Trentin AG. Skin wound healing in humans and mice: Challenges in translational research. *J Dermatol Sci*. 2018: 90(1):3-12. https://pubmed.ncbi.nlm.nih.gov/15260814/.
[52] Seok J, Warren HS, Cuenca AG, Mindrinos MN, Baker HV, Xu W, Richards DR, McDonald-Smith GP, Gao H, Hennessy L, Finnerty CC, López CM, Honari S, Moore EE, Minei JP, Cuschieri J, Bankey PE, Johnson JL, Sperry J, Nathens AB, Billiar TR, West MA, Jeschke MG, Klein MB, Gamelli RL, Gibran NS, Brownstein BH, Miller-Graziano C, Calvano SE, Mason PH, Cobb JP, Rahme LG, Lowry SF, Maier RV, Moldawer LL, Herndon DN, Davis RW, Xiao W, Tompkins RG; Inflammation and Host Response to Injury, Large Scale Collaborative Research Program. Genomic responses in mouse models poorly mimic human inflammatory diseases. *Proc Natl Acad Sci U S A*. 2013:26,110(9):3507-12. https://pubmed.ncbi.nlm.nih.gov/23401516/.
[53] Wufuer M, Lee G, Hur W, Jeon B, Kim BJ, Choi TH, Lee S. Skin-on-a-chip model simulating inflammation, edema and drug-based treatment. *Sci Rep*. 2016; 21, 6:37471. https://pubmed.ncbi.nlm.nih.gov/27869150/.
[54] Rimal R, Muduli S, Desai P, Marquez AB, Möller M, Platzman I, Spatz J, Singh S. Vascularized 3D Human Skin Models in the Forefront of Dermatological Research. *Adv Healthc Mater*. 2024: 13(9):e2303351. https://pmc.ncbi.nlm.nih.gov/articles/PMC11468127/.

Location	Wake Forest Institute for Regenerative Medicine, Winston-Salem, NC, USA
Grant Number	Award #: HT9425-23-1-0823; Proposal #: DM220030[55]
Funder	CDMRP
Dates	August 1, 2023 – July 31, 2026
Obligated Amount	$1,189,653
Summary	Experimenter Young Min Ju uses pigs to evaluate a synthetic, "off-the-shelf" wound treatment for severe burn injuries, framed in the context of battlefield trauma where, as he notes, "combat burn injuries are among common forms of battlefield injuries and are often more severe due to flame weapons and explosive blasts of ignitable materials."[56] In his experiment, he subjects pigs to full-thickness skin wounds—deep injuries that destroy the entire skin layer—to simulate combat-related burns. He then treats the animals with an experimental alginate-gelatin foam graft infused with recombinant proteins derived from stem cell signaling factors, to purportedly promote tissue regeneration and wound healing.
Critique	Differences in immune response between pigs and humans (and likely across different pig subspecies used in testing), challenges in precisely standardizing wound size and depth, and practical constraints such as the high cost and limited availability of validated reagents for pig tissues can all reduce experimental consistency and reliability. Taken together, these factors significantly limit how the results from wound studies on pigs effectively translate to human clinical outcomes.[57]

Location	Texas A&M Engineering Experiment Station, College Station, TX, USA
Grant Number	Award #: W81XWH-22-1-0932; Proposal #: PR210517[58]
Funder	CDMRP
Dates	August 15, 2022 – August 14, 2026
Obligated Amount	$2,404,778
Summary	Experimenter Akhilesh Gaharwar uses mice and rats to evaluate a synthetic injectable shape-memory hemostatic system designed for the treatment of non-compressible internal bleeding, such as liver and femoral artery injuries. He subjects these animals to severe wounds, including liver puncture or laceration and major arterial bleeding. The experimental

[55] Project Grant HT9425-23-1-0823—Development of a Stable and Effective Off-the-Shelf Wound Care Treatment for Combat Burn Injuries. DTIC. Accessed April 3, 2026. https://dtic.dimensions.ai/details/grant/grant.13740627.
[56] *Ibid*.
[57] Meurens F, Summerfield A, Nauwynck H, Saif L, Gerdts V. The pig: a model for human infectious diseases. *Trends Microbiol*. 2012: 20(1), 50-7. https://pubmed.ncbi.nlm.nih.gov/22153753/.
[58] Project Grant W81XWH-22-1-0932—Expandable Hemostats for Treatment of Noncompressible Intracavitary Hemorrhage. DTIC. Accessed April 3, 2026. https://dtic.dimensions.ai/details/grant/grant.13055957.

	biomaterial is then administered into the injury site, to fill the wound cavity and promote blood clot formation, with the aim of achieving rapid hemostasis and improving survival outcomes in humans. His experiment is framed against modern combat trauma, in which he notes that "in the last two decades, every major military conflict has seen an exponential increase in battlefield injuries emanating from military-grade high-velocity weapons," where bullet fracture and deformation generate extensive cavitation and wound channels.[59]
Critique	Experts state, "Rodents' skin is unique … [in how it] produces rapid wound contraction… In contrast, human wounds heal [differently] via re-epithelialization…"[60] In addition, inflammatory and injury responses in rodents do not consistently replicate human biology in complex conditions such as trauma and immune activation.[61] In hemorrhage tests, findings from animal experiments may simplify clinical reality and fail to capture the "heterogeneity of trauma populations,"[62] reflecting the complexity of human polytrauma, comorbidities, and variability in emergency care, which ultimately limits translational predictability.[63]

Location	Northwestern University, Chicago, IL, USA
Grant Number	W81XWH-21-1-0984[64]
Funding Office	CDMRP
Dates	September 30, 2021 – September 29, 2026
Obligated Amount	$8,105,163
Summary	Experimenter Gayle Woloschak exposes mice to harmful radiation and toxic metals to induce lung injuries in the animals, following which he administers various drugs. The mice are ultimately killed, and their lungs are removed for further experimentation.[65] His tests are predicated on reference to scenarios in which he states "active members of the U.S. military … might be deployed to areas heavily contaminated

[59] *Ibid.*
[60] Masson-Meyers DS, Andrade TAM, Caetano GF, Guimaraes DR, Leite MN, Leite SN, Frade MAC. Experimental models and methods for cutaneous wound healing assessment. *Int J Exp Path*. 2020;101:21–37. https://doi.org/10.1111/iep.12346.
[61] Seok et al. 2013.
[62] Frink M, Andruszkow H, Zeckey C, Krettek C, Hildebrand F. Experimental trauma models: an update. *J Biomed Biotechnol*. 2011:797383. https://pmc.ncbi.nlm.nih.gov/articles/PMC3035380/?utm_source=chatgpt.com#sec6.
[63] Pound P, Bracken MB. Is animal research sufficiently evidence based to be a cornerstone of biomedical research? *BMJ*. 2014:30,348:g3387. https://pubmed.ncbi.nlm.nih.gov/24879816/.
[64]Project Grant W81XWH-21-1-0984. Aligning Dosimetry and Biomarkers of Lung Injury with Prophylaxis and Mitigation of Damage from Radionuclides and Metals. DTIC. Accessed April 2, 2026. https://dtic.dimensions.ai/details/grant/grant.9843109.
[65] Project Grant W81XWH-21-1-0984

	with airborne or ground-dispersed radionuclides … following terrorist activities or nuclear incidents."[66]
Critique	The progression of radiation-induced lung injury is notably faster in rodents than in humans.[67] Furthermore, differences in the lung architecture and the immune responses in rodents versus humans may misrepresent the actualities of the human prognosis of radiation-induced lung injury. [68,69]

Location	Baylor College of Medicine, Houston, TX, USA
Grant Number	W81XWH-22-1-0741[70]
Funding Office	CDMRP
Dates	September 30, 2022 – September 29, 2026
Obligated Amount	$1,173,369
Summary	Experimenter Jijie Pang uses mice as young as three months old[71] in experiments that entail dripping various chemicals into the animals' eyes, clamping electrodes on their heads, and cutting out their eyes to isolate their retinas for further experimentation after killing them.[72] The testing—purportedly conducted to learn the mechanisms underlying traumatic retinal injury (TRI) resulting from exposure to blast-related pressure waves—is framed in part by claims that "results on TRI caused by infrasonic frequencies will provide knowledge for a potential weapon,"[73] which is said to offer clues for investigating national news reports involving American personnel working overseas and subjected to neurological injuries.
Critique	Such tests on animals are likely irrelevant to military personnel who are actually impacted by the effects of TRI. There are notable differences in the cellular composition and organization

[66] *Ibid*.
[67] Dabjan MB, Buck CM, Jackson IL, Vujaskovic Z, Marples B, Down JD. A survey of changing trends in modelling radiation lung injury in mice: bringing out the good, the bad, and the uncertain. Lab Invest. 2016;96(9):936-949. https://www.nature.com/articles/labinvest201676.
[68] Pan H, Deutsch GH, Wert SE; Ontology Subcommittee; NHLBI Molecular Atlas of Lung Development Program Consortium. Comprehensive anatomic ontologies for lung development: A comparison of alveolar formation and maturation within mouse and human lung. J Biomed Semantics. 2019;10(1):18. Published 2019 Oct 24. https://pubmed.ncbi.nlm.nih.gov/31651362/.
[69] Mestas J, Hughes CC. Of mice and not men: differences between mouse and human immunology. J Immunol. 2004;172(5):2731-2738. https://pubmed.ncbi.nlm.nih.gov/14978070/.
[70]Project Grant W81XWH-22-1-0741—Roles of Mechanosensitive Channels in Pressure Wave-Induced Retinal Damage. DTIC. Accessed April 2, 2026. https://dtic.dimensions.ai/details/grant/grant.13859127.
[71] Pang VY, Yang Z, Wu SM, Pang JJ. The co-expression of the depolarizing and hyperpolarizing mechanosensitive ion channels in mammalian retinal neurons. Front Med (Lausanne). 2024;11:1463898. Published 2024 Nov 13. doi:10.3389/fmed.2024.1463898.
[72] Long Y, Kozhemyakin M, Wu SM, Pang JJ. TRPV4 affects visual signals in photoreceptors and rod bipolar cells. *Front Cell Neurosci*. 2024;18:1404929. https://www.frontiersin.org/journals/cellular-neuroscience/articles/10.3389/fncel.2024.1404929/full.
[73] Project Grant W81XWH-22-1-0741

	of the human retina when compared to a mouse retina.[74] For instance, the localization of mechanosensitive ion channels, which are believed to play a key role in TRI,[75] varies significantly between the two species.[76]

Location	The Methodist Hospital Research Institute, Houston, TX, USA
Grant Number	HT9425-24-1-0842[77]
Funder	CDMRP
Dates	September 15, 2024 – September 14, 2027
Obligated Amount	$1,400,000
Summary	Experimenter Biana Godin inflicts radiation-induced skin burns on rats and injects pigs and rats with experimental substances. The animals' organs and tissues are then removed for further experimentation. She states that given "the development of nuclear weapons and increased frequency of nuclear threats … there is an urgent need to protect the military, Army Veterans and civilians against radiation exposure."[78]
Critique	Studies report interspecies differences in skin sensitivity to radiation between humans and rodents, whose skin "is approximately two orders of magnitude more sensitive than human skin cancer dose response."[79] Data gained from such experiments on rats may translate poorly to a human clinical setting. In addition, due to their substantially thicker skin compared with humans, live pigs are a poor model for gaining human-relevant insights into radiation-induced burns, even when similar burn injuries are inflicted.[80]

We urge you to permanently ban the use of dogs, cats, non-human primates, marine mammals, and *all* other animals in weapon-wounding tests by issuing an explicit public policy to replace the regulatory gap left by the rescinding of Policy 84.

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[74] Volland S, Esteve-Rudd J, Hoo J, Yee C, Williams DS. A comparison of some organizational characteristics of the mouse central retina and the human macula. PLoS One. 2015;10(4):e0125631. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0125631.

[75] Pang JJ. The Variety of Mechanosensitive Ion Channels in Retinal Neurons. Int J Mol Sci. 2024;25(9):4877. https://pubmed.ncbi.nlm.nih.gov/38732096/.

[76] Garcia-Sanchez J, Lin D, Liu WW. Mechanosensitive ion channels in glaucoma pathophysiology. *Vision Res*. 2024;223:108473. https://pubmed.ncbi.nlm.nih.gov/39180975/.

[77]Project Grant: HT9425-24-1-0842. Development of a Novel Therapeutic to Treat DNA Damage Associated with Atypical Burns. DTIC. Accessed April 2, 2026. https://dtic.dimensions.ai/details/grant/grant.14273421.

[78] *Ibid*.

[79] Coggle JE, Williams JP. Experimental studies of radiation carcinogenesis in the skin: a review. Int J Radiat Biol. 1990;57(4):797-808. https://pubmed.ncbi.nlm.nih.gov/1969908/.

[80] McLellan R. Pigs and military: Medical training using animals does not save lives. The San Diego Union-Tribune. March 31, 2012. Accessed August 27, 2025. http://www.sandiegouniontribune.com/sdut-military-medical-training-using-animals-does-not-2012mar31-story.html.

DOW Funding of Animal Testing at Foreign Institutions

The Animal Care and Use Review Office (ACURO), DHA's component review office, currently reviews and approves animal testing protocols supported by DOW, *including those conducted at foreign institutions using DOW funds*—as governed by its "ACURO Policy on Work Conducted in Foreign Countries."[81]

DOW has wasted *over $21 million in taxpayer dollars* since 2019 on funding cruel and irrelevant tests on animals at nine foreign institutions that fail to effectively advance human health. Below are nine such inhumane, DOW-funded, and active experiments on animals conducted at nine overseas institutions:

Location	University of Antofagasta, Chile
Grant Number	FA95502410248[82]
Funder	United States Department of the Air Force
Dates	August 15, 2024 – August 14, 2027
Obligated Amount	$173,044
Summary	Experimenter David Andrade subjects rats to simulated microgravity using a tail head-down tilt model, which suspends the animals by their tails to mimic the fluid shift towards the head experienced during spaceflight. He also subjects them to insufficient oxygen supply (hypoxia) and excessive oxygen supply (hyperoxia), both of which can cause significant physiological stress. Additionally, he examines muscle dysfunction in the animals promoted by their exposure to simulated microgravity environments.[83] [*Note: This paraphrased content—based on Spanish-language public records that we obtained from the University of Antofagasta, Chile—was translated into English.*]
Critique	Because humans are bipedal, our lower-body musculature evolved to support our weight (by bearing upside loads); in microgravity these muscles weaken quickly and impact bone density and cardiovascular health.[84] The tail-suspension approach in quadrupeds (i.e., rodents) introduces model-specific biomechanical stress (lumbosacral lordosis) that differs from stressors seen in human upright unloading, so

[81] U.S. Army Medical Research and Development Command. (n.d.). ACURO policy on work conducted in foreign countries. Accessed March 6, 2026. https://mrdc.health.mil/assets/docs/orp/acuro/ACURO_policy_on_work_in_foreign_countries_final.pdf.

[82] Project Grant FA95502410248—Role of chemoreceptors as microgravity sensors- an approach from preclinical model to human performance and spaceflight. DTIC. Accessed March 6, 2026. https://dtic.dimensions.ai/details/grant/grant.14882147.

[83] Public records released by the University of Atofagasta, Chile, to PETA US. January 8, 2026. Accessed April 7, 2026. https://www.peta.org/wp-content/uploads/2026/03/Protocolo.pdf.

[84] Tanaka K, Nishimura N, Kawai Y. Adaptation to microgravity, deconditioning, and countermeasures. *J Physiol Sci*. 2017 Mar; 67(2):271-281. https://doi.org/10.1007/s12576-016-0514-8.

	results from tail-suspended rats are poorly-predictive of human physiological adaptation to spaceflight.[85]

Location	Ben-Gurion University of the Negev, Israel
Grant Number	N629092412015[86]
Funder	United States Department of the Navy
Dates	January 5, 2024 – January 4, 2027
Obligated Amount	$299,850
Summary	Experimenter Ohad Ben-Shahar invasively manipulates goldfish by mounting "computational systems" on their heads—these computational devices are used "to read and process information from tiny sensors (e.g., a camera), make behavioral decisions using on-board AI decision-making software, and implement these behaviors using direct brain stimulation to selected areas in the goldfish brain;" and, one of the goals is to "exploit the reward centers in the fish brain to manipulate its behavior …"[87]
Critique	Using an animal's body as a robotic scaffold to be externally manipulated blurs the distinction between a machine and a living being, raising profound concerns for the animal's bodily autonomy, welfare, and the fundamental integrity of life.[88]

Location	Recce Pharmaceuticals Ltd, Australia
Grant Number	Award # HT9425-24-1-0840; Proposal #: MB230052[89]
Funder	CDMRP
Dates	August 1, 2024 – July 31, 2027
Obligated Amount	$2,000,000
Summary	Experimenter Michele Dlizia inflicts severe thermal burns on rats and pigs to test a new synthetic anti-infective drug. In these experiments, she deliberately burns and infects the animals with dangerous bacteria (e.g., methicillin-resistant *S. aureus* [MRSA]) to create acute wound infections, before killing them. She then applies experimental gel formulations to the animals' open wounds to measure bacterial reduction and healing rates.
Critique	Unlike human skin, pig's skin lacks eccrine sweat glands and has a less developed vascular plexus, leading to significant

[85] Morey-Holton ER, Globus RK. Hindlimb unloading rodent model: technical aspects. *J of App Physiol.* 2002: 92(4), 1367–1377. https://doi.org/10.1152/japplphysiol.00969.2001.
[86] Project Grant N629092412015—Towards autonomous marine biobots by direct brain stimulation: the ultimate conjunction of artificial intelligence and brain sciences. DTIC. Accessed March 6, 2026. https://dtic.dimensions.ai/details/grant/grant.14526254.
[87] *Ibid.*
[88] Mestre R, Astobiza AM, Webster-Wood VA, Ryan M, Saif MTA. Ethics and responsibility in biohybrid robotics research. *PNAS*. 2024: 121(31), e2310458121. https://doi.org/10.1073/pnas.2310458121.
[89] Project Grant HT9425-24-1-0840—A Novel, Synthetic Antiinfective Drug Candidate, R-327, for the Acute Treatment of Burn Wounds and Downstream Sequelae. DTIC. Accessed March 6, 2026. https://dtic.dimensions.ai/details/grant/grant.14084345.

	differences in immune response and re-epithelialization that make the results poor predictors of human clinical outcomes.[90]

Location	Atuka, Canada
Grant Number	Award #: W81XWH-22-1-1043; Proposal #: PR210682[91]
Funder	CDMRP
Dates	September 3, 2022 – September 29, 2026
Obligated Amount	$1,528,921
Summary	Experimenter Jonathan Brotchie subjects 24 female macaques to invasive brain surgeries in purported attempts to develop a "model" of dystonia. He injects viral vectors into the animals' cerebellums to induce debilitating symptoms, including abnormal muscle contractions and motor deficits, which the animals endure for months before being killed and dissected.
Critique	The human cerebellum (i.e., the dentate nucleus and its projections to the prefrontal cortex) has undergone an evolutionary expansion, resulting in distinct neural architecture and functional connectivity that makes macaque brains poor predictors of human clinical outcomes.[92]

Location	James Cook University, Australia
Award Number	W81XWH-22-1-0556[93]
Funder	CDMRP
Dates	July 15, 2022 – July 14, 2026
Obligated Amount	$599,984
Summary	Experimenter Geoffrey Dobson inflicts "30% [total body surface area] thermal injury… in male and female Sprague-Dawley rats… via 8-sec skin contact with scalding 96°C water."[94] He also inflicts massive and "[u]ncontrolled hemorrhage"[95] in the animals by surgically removing half of their liver lobes.
Critique	Rodents have a subcutaneous muscle layer that causes severe burns to heal via rapid wound contraction, unlike human skin

[90] Elloso M, Hutter MF, Jeschke N, Rix G, Chen Y, Douglas A, Jeschke MG. Challenges of Porcine Wound Models: A Review. *Int J Transl Med*. 2025; 5(1):4. https://doi.org/10.3390/ijtm5010004.
[91] Project Grant W81XWH-22-1-1043—Development of a Non-Human Primate Model for the Identification and Development of Novel Therapeutics for Dystonia. DTIC. Accessed March 6, 2026. https://dtic.dimensions.ai/details/grant/grant.13055960.
[92] Ramnani N. The primate cortico-cerebellar system: anatomy and function. *Nat Rev Neurosci*. 2006; 7(7):511-522. https://doi.org/10.1038/nrn1953
[93]Project Grant W81XWH-22-1-0556—Small-volume ALM therapy for resuscitation and stabilization following combined burn injury and hemorrhagic shock. DTIC. Accessed March 9, 2026. https://dtic.dimensions.ai/details/grant/grant.12942939.
[94] Public records released from James Cook University, Australia, to PETA US. December 1, 2025. Accessed April 7, 2026. https://www.peta.org/wp-content/uploads/2026/03/Q3-Animal-Use-Protocols_Redacted.pdf.
[95] *Ibid.*

	that heals through slow re-epithelialization. This renders rats to be poor predictors of human battlefield polytrauma.[96]

Location	University of British Columbia, Canada
Grant Number	Award #: HT9425-24-1-0912; Proposal #: SC230114[97]
Funder	CDMRP
Dates	September 30, 2024 – September 29, 2027
Obligated Amount	$1,156,654
Summary	Experimenter Brian Kwon damages Yucatan mini-pigs' thoracic spinal cords to induce paralysis and severe bladder dysfunction and to test a sacral neuromodulation system for bladder control. He then implants electrical generators in their flanks, electrodes in their sacral nerve roots, and pressure sensors inside their bladders. The animals are forced to endure 13 weeks of repeated electrical stimulation to manipulate their urination reflexes.
Critique	Major differences exist between the anatomical organization of the sacral nerve roots in humans and pigs—the Yucatan pig spinal cord terminates much lower in the sacrum, making results from these animals poor predictors of human clinical outcomes.[98]

Location	University of British Columbia, Canada
Grant Number	Award #: W81XWH-21-2-0042; Proposal #: PR201092[99]
Funder	CDMRP
Dates	September 30, 2021 – September 29, 2026
Obligated Amount	$4,269,089
Summary	Experimenter Stephen Withers uses pigs to test a whole blood conversion unit (WBCU) purportedly designed to transform A or B type blood into universal O type using enzymes derived from the human gut microbiome. After engineering enzymatic cocktails that strip antigens from red blood cells, he subjects animals to various tests, which may involve transfusing modified blood into pigs and monitoring them for adverse reactions.
Critique	Unlike humans, pigs express the Alpha-Gal carbohydrate on their cell surfaces; it triggers a powerful immune response in

[96] Abdullahi A, Amini-Nik S, Jeschke MG. Animal models in burn research. *Cell. Mol. Life Sci.* 2014: 71, 3241–3255. https://doi.org/10.1007/s00018-014-1612-5.
[97] Project Grant HT9425-24-1-0912—Neuromodulation for improving bladder function in a large animal model of SCI. DTIC. Accessed March 6, 2026. https://dtic.dimensions.ai/details/grant/grant.14358071.
[98] Busscher I, Polender BA, van der Veen AJ, Diepstraten FA, Veldhuizen AG, Burgerhof JG, van Dijk M. Comparative anatomical dimensions of the complete human and porcine spine. *Euro Sci J.* 2010: 19(7), 1104–1114. https://doi.org/10.1007/s00586-010-1326-9.
[99] Project Grant W81XWH-21-2-0042—Toward Universal Whole Blood in the Battlefield. DTIC. Accessed April 9, 2026. https://dtic.dimensions.ai/details/grant/grant.9843106.

	humans but is absent in pigs.[100] As such, wild-type pigs can't reliably predict how human antibodies react to modified blood.

Location	University of British Columbia, Canada
Grant Number	Award #: HT9425-23-1-0777; Proposal #: SC220107[101]
Funder	CDMRP
Dates	September 30, 2023 – September 29, 2026
Obligated Amount	$1,731,421
Summary	Experimenter Babak Shadgan subjects Yucatan miniature pigs to spinal cord contusion and compression injuries, and he catheterizes their spinal cords to test an optical near-infrared spectroscopy (NIRS) sensor to monitor tissue perfusion and oxygenation. Pigs then undergo hemodynamic manipulation, including drug-induced blood pressure control and measurement of metabolic markers, after which they are killed.
Critique	Given the translational gap in extrapolating results from animal tests to human outcomes,[102] and the known variability and bias in experimental spinal cord injury studies,[103] it is unethical to subject 24 pigs to invasive spinal cord injuries—especially since human-relevant data on NIRS is already being collected.[104]

Location	University of British Columbia, Canada
Grant Number	Award #: W81XWH-22-1-0929; Proposal #: SC210078[105]
Funder	CDMRP
Dates	September 30, 2022 – September 29, 2026
Obligated Amount	$1,743,216
Summary	Experimenter Andrei Krassioukov uses 140 Wistar rats to test the efficacy of transcutaneous stimulation (TCS) for restoring autonomic functions—such as cardiovascular, bladder, and bowel control—after spinal cord injury (SCI). He subjects the animals to severe thoracic contusion injuries, after which the

[100] Galili U. Anti-Gal: an abundant human natural antibody of multiple pathogeneses and clinical benefits. *Immunol.* 2013: 140(1):1-11. https://pubmed.ncbi.nlm.nih.gov/23578170/.
[101] Project Grant HT9425-23-1-0777—Advanced Physiologic Monitoring at the Site of Spinal Cord Injury. DTIC. Accessed April 10, 2026. https://dtic.dimensions.ai/details/grant/grant.13859054.
[102] Perel P, Roberts I, Sena E, Wheble P, Briscoe C, Sandercock P, Macleod M, Mignini LE, Jayaram P, Khan KS. Comparison of treatment effects between animal experiments and clinical trials: systematic review. *BMJ*. 2007: 27;334(7586):197. https://pubmed.ncbi.nlm.nih.gov/17175568/
[103] Watzlawick R, Antonic A, Sena ES, Kopp MA, Rind J, Dirnagl U, Macleod M, Howells DW, Schwab JM. Outcome heterogeneity and bias in acute experimental spinal cord injury: A meta-analysis. Neurology. 2019 Jul 2;93(1):e40-e51. https://pubmed.ncbi.nlm.nih.gov/31175207/
[104] *Ibid.*
[105] Project Grant W81XWH-22-1-0929—Noninvasive Spinal Cord Stimulation for Recovery of Autonomic Function After Spinal Cord Injury: Moving from Mechanisms to Clinical Practice. DTIC. Accessed April 9, 2026. https://dtic.dimensions.ai/details/grant/grant.13056021.

	rats undergo TCS or sham stimulation with physiological monitoring.
Critique	TCS is safe for human trials, making this SCI rat test wasteful. Such animal tests have outcome variability and experimental bias, undermining reproducibility and interpretability.[106]

Location	University of British Columbia, Canada
Grant Number	Award #: HT9425-23-1-0626; Proposal #: RT220003[107]
Funder	CDMRP
Dates	August 1, 2023 – July 31, 2026
Obligated Amount	$525,000
Summary	Experimenter Megan Levings surgically grafts donor skin patches and entire hind limbs onto recipient mice who have been altered to carry human immune components. These animals are then injected with an engineered form of "suppressor" immune cells, while being maintained on immunosuppressive drugs. The animals are monitored for graft survival before being killed.
Critique	While these mice are engineered to carry human immune components, they lack the full systemic architecture and environmental "memory" of a human immune system, often leading to a failure in predicting how engineered cells will behave in actual patients.[108] In addition, because mice in laboratories "live in abnormally hygienic specific pathogen-free… facilities,"[109] their immune systems resemble those of newborn humans more than adults; consequently, the outcomes of such testing frequently fail to translate to the complex immune environments of human transplant recipients.

Location	McGill University, Canada
Award Number	Award #: W81XWH-19-1-0853; Proposal #: VR180080[110]
Funder	CDMRP
Dates	September 30, 2019 – September 29, 2026
Obligated Amount	$5,863,701

[106] Watzlawick R, Antonic A, Sena ES, Kopp MA, Rind J, Dirnagl U, Macleod M, Howells DW, Schwab JM. Outcome heterogeneity and bias in acute experimental spinal cord injury: A meta-analysis. *Neurol*. 2019: 2;93(1):e40-e51. https://pubmed.ncbi.nlm.nih.gov/31175207/.
[107] Project Grant HT9425-23-1-0626—Engineering an Effective CAR Treg Combination Therapy to Control VCA Rejection. DTIC. Accessed April 8, 2026. https://dtic.dimensions.ai/details/grant/grant.13741148.
[108] Mestas J, Hughes CC. Of mice and not men: Relevant differences in evolutionary signatures to immune responses. *J Immunol*. 2004: 172(5), 2731–2738. https://doi.org/10.4049/jimmunol.172.5.2731.
[109] Beura LK, Hamilton SE, Bi K, Schenkel JM, Odumade OA, Casey KA, Thompson EA, Fraser KA, Rosato PC, Filali-Mouhim A, Sekaly RP, Jenkins MK, Vezys V, Haining WN, Jameson SC, Masopust D. Normalizing the environment recapitulates adult human immune traits in laboratory mice. *Nature.* 2016: 28;532(7600):512-6. https://pubmed.ncbi.nlm.nih.gov/27096360/.
[110] Project Grant W81XWH-19-1-0853—Novel Diagnostic, Prognostic, and Therapeutic Tools for Battlefield Optic Nerve Trauma. DTIC. Accessed April 14, 2026. https://dtic.dimensions.ai/details/grant/grant.8587781.

Summary	Experimenter Leonard Levin subjects rats to traumatic optic nerve injury, leading to degeneration of retinal ganglion cells and vision loss. He then tests experimental drugs on the animals, who undergo imaging to track neurodegeneration and recovery.
Critique	Humans have up to 1.7 million optic nerve axons,[111] whereas rats have about 135,000,[112] highlighting big species differences. Experts warn that "…the retina of each species is well adapted to the visual theatre into which that species is born… Analogies between different species may, therefore,… be misleading."[113]

Location	Sunnybrook Research Institute, Canada
Grant Number	Award #: HT9425-24-1-0697; Proposal #: RH230020[114]
Funder	CDMRP
Dates	August 1, 2024 – July 31, 2027
Obligated Amount	$824,505
Summary	Experimenter Alain Dabdoub subjects rats to auditory neuropathy to test MRI-guided focused ultrasound (FUS) as a method for delivering gene therapy to the inner ear. He uses focused ultrasound to temporarily open the blood–labyrinth barrier, allowing viral vectors carrying neurogenic genes to enter the animals' cochlea and act on inner ear cells, after which he monitors them for changes in auditory function and neuronal structure and the animals are likely killed.
Critique	Human primary auditory neuron degeneration follows a distinct trajectory not replicated by induced trauma in rats living in a laboratory shielded from chronic noise, which characterizes human life in industrialized societies.[115] Such rats do not develop the massive high-frequency hearing loss that is the hallmark of industrialized human life.[116]

[111] Jonas JB, Schmidt AM, Müller-Bergh JA, Schlötzer-Schrehardt UM, Naumann GO. Human optic nerve fiber count and optic disc size. *Inves Ophthalmol Vis Sci.* 1992: 33(6), 2012–2018. https://iovs.arvojournals.org/article.aspx?articleid=2161180.

[112] Fukui Y, Hayasaka S, Bedi KS, Ozaki HS, Takeuchi Y. Quantitative study of the development of the optic nerve in rats reared in the dark during early postnatal life. *J Anat*. 1991: 174:37-47. https://pmc.ncbi.nlm.nih.gov/articles/PMC1256041/.

[113] Kim US, Mahroo OA, Mollon JD, Yu-Wai-Man P. Retinal Ganglion Cells-Diversity of Cell Types and Clinical Relevance. Front *Neurol*. 2021: 21;12:661938. https://pmc.ncbi.nlm.nih.gov/articles/PMC8175861/.

[114]Project Grant HT9425-24-1-0697—Novel Therapeutic and Delivery Strategies for Primary Auditory Neuron Regeneration. DTIC. Accessed April 10, 2026. https://dtic.dimensions.ai/details/grant/grant.14084341

[115] Makary CA, Shin J, Kujawa SG, Liberman MC, Merchant SN. Age-related primary cochlear neuronal degeneration in human temporal bones. *J Assoc Res Otolaryngol*. 2011: 12(6):711-7. https://pubmed.ncbi.nlm.nih.gov/21748533/.

[116] Wu PZ, O'Malley JT, de Gruttola V, Liberman MC. Age-Related Hearing Loss Is Dominated by Damage to Inner Ear Sensory Cells, Not the Cellular Battery That Powers Them. *J Neurosci.* 2020: 12;40(33):6357-6366. https://pubmed.ncbi.nlm.nih.gov/32690619/.

Location	University of Melbourne, Australia
Grant Number	Award #: W81XWH-22-1-0353; Proposal #: EP210052[117]
Funder	CDMRP
Dates	May 15, 2022 – May 14, 2026
Obligated Amount	$699,454
Summary	Experimenter Sam John implants micromagnetic endovascular stents in the major brain veins of sheep to stimulate and monitor their motor cortex responses, after which they're likely killed.
Critique	Human stimulation effects depend on small variations in brain anatomy,[118] whereas sheep have major anatomical differences from humans. Given animal tests' poor translational value to human clinical outcomes, and that animal-free methods are widely available,[119] there is no scientific or ethical justification for these tests on sheep.

For your reference, below is a photo of an animal locked in pelvic suspension brace at the University of Antofagasta in Chile, in an active DOW-funded experiment to study the effects of microgravity on human health, even though animal-free methods are available:[120]

[117] Project Grant W81XWH-22-1-0353—Novel Endovascular Micromagnetic Neuromodulation for the Treatment of Drug-Resistant Epilepsy. DTIC. Accessed April 10, 2026. https://dtic.dimensions.ai/details/grant/grant.12912797.
[118] Opitz A, Windhoff M, Heidemann RM, Turner R, Thielscher A. How the brain tissue shapes the electric field induced by transcranial magnetic stimulation. *Neuroimage.* 2011: 1;58(3):849-59. https://pubmed.ncbi.nlm.nih.gov/21749927/.
[119] Beuter A. The use of neurocomputational models as alternatives to animal models in the development of electrical brain stimulation treatments. *Altern Lab Anim*. 2017: 45(2):91-99. https://pubmed.ncbi.nlm.nih.gov/28598194/.
[120] Image from public records released by the University of Atofagasta, Chile, to PETA US. January 8, 2026. Accessed April 7, 2026. https://www.peta.org/wp-content/uploads/2026/03/Protocolo.pdf.

Additionally, below are two photos of rats subjected to extreme burn trauma and severe hemorrhage in an active DOW-funded experiment at Australia's James Cook University—where experimenter Geoffrey Dobson plunges animals into near-boiling water, causing third-degree burns over their bodies before removing part of their livers or subjecting them to internal hemorrhaging before being killed—that produces no meaningful insights for human medicine:[121]

[121] Image from public records released by James Cook University, Australia, to PETA US. December 1, 2025. Accessed April 7, 2026. https://www.peta.org/wp-content/uploads/2026/03/Q3-Animal-Use-Protocols_Redacted.pdf.

Given your commitment to "strengthening the military by cutting fiscal fraud, waste, and abuse at DOD while also finding ways to refocus the department's budget,"[122] we urge you to continue taking actions aligned with that vision—including by prohibiting DOW funds from going to fund foreign institutions.

A Call for Collaboration Toward Better DOW Medical Research and Less Waste

PETA's scientific team is eager to collaborate with DOW to identify validated, non-animal technologies—such as high-fidelity human-patient simulators, advanced computational models, modern in vitro methods, and human tissue-based platforms like organoids, Organs-on-Chips technology and more—that deliver high-quality data at lower cost and save animals' lives across the board. By emulating forward-thinking reforms recently adopted under the Trump administration by the Centers for Disease Control and Prevention, Environmental Protection Agency, Food and Drug Administration, National Institutes of Health, U.S. Navy, and others to phase out animal experiments, the DOW can enhance care for our troops, prevent needless animal suffering, and demonstrate responsible stewardship of taxpayer dollars.

[122] Olay M. 2025, February 20. Hegseth addresses strengthening military by cutting excess, refocusing DoD budget. U.S. Department of Defense. Accessed March 9, 2026. https://www.defense.gov/News/News-Stories/Article/article/4072698/hegseth-addresses-strengthening-military-by-cutting-excess-refocusing-dod-budget/