AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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

Via e-mail: [redacted]

Dear Dr. Bhattacharya,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA)—whose entities have more than 10.4 million members and supporters worldwide—to express serious concerns regarding deficiencies in the National Institutes of Health's (NIH) oversight of foreign institutions conducting agency-funded experiments on animals. In light of the evidence presented below, PETA urges you to prohibit NIH funding for animal experiments conducted outside the United States.

In a June 2026 letter responding to concerns raised by PETA, the Office of Laboratory Animal Welfare (OLAW) asserted that allegations of inadequate oversight of foreign institutions were "factually incorrect." OLAW further stated that NIH had implemented a series of oversight measures in response to recommendations from the U.S. Government Accountability Office, including virtual site visits, enhanced review of animal welfare documentation, annual reporting requirements, increased communication with foreign institutions, and ongoing monitoring of noncompliance.[1]

However, records obtained by PETA through a Freedom of Information Act (FOIA) request call into question whether these measures are sufficient to ensure compliance with NIH policies or protect animals used in NIH-funded experiments overseas.

PETA identified multiple deficiencies, including:

- Foreign organizations receiving NIH funding for experiments on animals despite the absence of assurance records that should demonstrate compliance with NIH animal welfare requirements.
- Institutions with incomplete oversight documentation and gaps in records relevant to animal welfare compliance.
- "Enhanced" virtual site visits announced months in advance and conducted through prearranged briefings, institution-selected participants, document reviews, and institution-controlled camera tours.
- Oversight evaluations that frequently resulted in highly favorable assessments despite documented weaknesses in oversight systems.

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

[1]NIH Office of Laboratory Animal Welfare. Response to PETA, June 5, 2026.

NIH-funded animal experiments conducted at an institution lacking the required Assurance
In 2022, NIH awarded the University of Sydney contract 75N93022C00041, "Advancing vaccine adjuvant research for tuberculosis (AVART),"[2] valued at more than $13 million.[3] Yet from the outset, the animal experiments were conducted at the Centenary Institute, a separate legal entity that lacked the required NIH Foreign Animal Welfare Assurance. NIH did not identify the problem until 2025, when the University of Sydney contacted OLAW to ask whether the January 2024 death of a mouse used in the NIH-funded research was reportable. The mouse's death itself had not been reported to the responsible animal welfare committee until nearly two months after it occurred because of what the university described as a breakdown in communication. A serious, years-long compliance failure was therefore uncovered only after review of an animal-death incident exposed the broader institutional violation.[4]

The subsequent correspondence exposed broader weaknesses in the oversight arrangement. The University of Sydney stated that the animal experiments did not take place on university property and were reviewed and approved by the Sydney Local Health District Animal Welfare Committee rather than the university's own committee.[5] Meanwhile, the principal investigator, who was based at the Centenary Institute, publicly presented AVART as the institute's NIH contract.[6] The location of the experiments and Centenary's role were therefore not concealed. Nevertheless, the arrangement escaped NIH scrutiny for years. Rather than conducting an independent investigation into how the violation had persisted for years, NIH had Centenary obtain an Assurance and then considered the matter resolved.[7]

NIH-funded animal experiments conducted at organizations for which NIH could not locate required Animal Welfare Assurances
NIH has awarded grants and contracts involving animal experiments to multiple foreign organizations for which it could not locate records of the required Animal Welfare Assurances:

- Kinoxis Therapeutics, Australia. The grant 5UH3DA048743, "Advancing KNX100 for the treatment of opioid withdrawal: Preclinical efficacy and toxicology, and a Phase 1 clinical program," was awarded in September 2019 and remained active until May 2026.[8] It involved the use of 80 dogs, 314 rats, and 1,485 mice.[9] According to NIH, "*No records of an assurance [were] located*."[10]
- University of Prince Edward Island, Canada. The grant 1R21NS104604, "Chronic deficits in auditory communication following early life seizures," was awarded in September 2018 and

[2]RePORTER. Advancing vaccine adjuvant research for tuberculosis (AVART). Accessed: October 14, 2026.
[3]U.S. General Services Administration. Advancing vaccine adjuvant research for tuberculosis. Accessed: October 14, 2026.
[4]NIH Office of Laboratory Animal Welfare. OLAW correspondence with University of Sydney, March – August, 2025.
[5]*Ibid*.
[6]Centenary Institute. Britton Laboratory. Accessed: October 14, 2026.
[7]NIH Office of Laboratory Animal Welfare. OLAW correspondence with University of Sydney, March – August, 2025.
[8]RePORTER. Advancing KNX100 for the treatment of opioid withdrawal: Preclinical efficacy and toxicology, and a phase 1 clinical program. Accessed: October 14, 2026.
[9]Department of Health & Human Services. Notice of Award FAIN# UG3DA048743, June 24, 2021. Selected pages.
[10]NIH response to PETA. October 14, 2026.

was active until August 2023.[11] It involved the use of rats.[12] According to NIH, "*No records of an assurance [were] located*."[13]

- Kenyatta University, Kenya. The grant 1R01AI160433, "Characterisation of drug resistance in field-collected schistosomes," was awarded in May 2021 and will remain active until April 2027.[14] It involves the use of hamsters.[15] According to NIH, "*No records of an assurance [were] located*."[16]
- Pluri Biotech LTD (formerly known as Pluri Inc., or Pluristem Therapeutics), Israel. The contract 75N93023C00012-0-9999-1, "Development of PLX-R18 cell therapy as a countermeasure for Hematopoietic Acute Radiation Syndrome," was awarded in July 2023[17] and terminated in April 2025,[18] two months ahead of schedule. It involved the use of mice and monkeys.[19] According to NIH, "*No records of an assurance [were] located*."[20]

These examples suggest that NIH has funded animal experiments at multiple foreign organizations even when OLAW could not locate records demonstrating compliance with a basic oversight requirement intended to govern such activities.

Incomplete or inconsistent records for foreign institutions

Of the hundreds of foreign organizations listed in OLAW's Assured Institutions database, PETA identified 40 for its records request. The request covered records maintained or produced between January 2024 and June 2026, including annual reports concerning activities during the 2023, 2024, and 2025 reporting periods. According to NIH's response to PETA's follow-up request regarding missing records, additional searches failed to locate certain annual reports and other oversight records for several foreign institutions:[21]

- International Center for Medical Training and Research (Centro Internacional de Entrenamiento e Investigaciones Médicas, CIDEIM), Colombia. The annual reports for 2023, 2024, and 2025 do not exist.
- National University of Cordoba, Argentina. The annual report for the year 2023 does not exist.
- Icesi University, Colombia. The annual report for the year 2023 does not exist.

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[11]RePORTER. Chronic deficits in auditory communication following early life seizures. Accessed October 12, 2026.
[12]Bigelow LJ, Fiset C, Jarvis JHM, et al. Early-life seizures modify behavioral response to ultrasonic vocalization playback in adult rats. *Epilepsy Behav*. 2022;127:108494. doi:10.1016/j.yebeh.2021.108494
[13]NIH response to PETA. October 14, 2026.
[14]RePORTER. Characterisation of drug resistance in field-collected schistosomes. Accessed October 12, 2026.
[15]*Ibid*.
[16]NIH response to PETA. October 14, 2026.
[17]RePORTER. Development of PLX-R18 cell therapy as a countermeasure for Hematopoietic Acute Radiation Syndrome. Accessed October 12, 2026
[18]Department of Health & Human Services. HHS Terminated Contracts – Ending Wasteful Spending. Page 37. Accessed October 12, 2026.
[19]Singh VK, Machlenkin A, Seed TM. Development of PLX-R18, a promising and novel countermeasure for radiation-associated injuries. *Drug Discov Today*. 2025;30(11):104502. doi:10.1016/j.drudis.2025.104502. The article notes: "A series of preclinical, animal-based safety and efficacy assessments of PLX-R18 has been conducted by Pluri. A toxicological study in unirradiated immunocompromised mice supports the safety of PLX-R18, with no adverse effect after treatment following repeated injections (Unpublished – Pluri Biotech Investigator brochure). Biodistribution studies, conducted in both immunocompromised, unirradiated mice and in immunocompetent, unirradiated and irradiated rhesus nonhuman primates (NHP), demonstrated that PLX-R18 cells remain locally at the intramuscular (im) injection site for a limited time, after which these cells are cleared from the body (Unpublished – Pluri Biotech Investigator brochure)."
[20]NIH response to PETA. October 14, 2026.
[21]*Ibid*.

- University of the Andes (Universidad de los Andes), Colombia. The annual reports for the years 2023 and 2024 do not exist.
- National University of San Marcos (Universidad Nacional Mayor de San Marcos, UNMSM), Peru. The annual reports for the years 2023 and 2025 do not exist.

Additionally, NIH records associate CIDEIM and Icesi University with the same Assurance number,[22] even though they are legally distinct organizations.[23,24] The Assurance documents produced by NIH identify Icesi as the assured institution and do not identify CIDEIM or explain how CIDEIM's activities would be covered.[25]

These examples raise questions about the completeness and reliability of OLAW's records concerning foreign institutions. If annual reports and Assurance documentation cannot be consistently located or reconciled, it becomes difficult to determine whether foreign organizations are being monitored in accordance with NIH requirements.

NIH-funded animal experiments approved despite significant facility and compliance deficiencies

NIH has awarded funding for animal experiments at foreign facilities where significant deficiencies in staffing, containment, biosafety, or compliance systems were identified only after funding had been awarded. An NIH-funded Hendra virus study at CSIRO's Australian Centre for Disease Preparedness ("Shining a light on bat cellular immunity following virus infection," R21AI169481)[26] was suspended by its Animal Ethics Committee after problems emerged involving prolonged confinement of flying foxes without adequate enrichment, insufficient appropriately trained personnel available to perform animal work at the required containment level, inadequate contingency planning, and unclear proposed procedures. The facility's limitations also had direct consequences for the animals: after one flying fox tested positive for Hendra virus, all eight bats housed together were killed because the room in which they were confined could not be elevated to BSL-4 containment. A ninth flying fox housed at BSL-4 was subsequently killed after also testing positive.[27] Crucially, these shortcomings came to light after the research was already underway, rather than being identified before NIH-supported animal activities began. The principal investigator informed NIH of the naturally occurring Hendra infections on May 22, 2023, and the Animal Ethics Committee suspended the project on June 8. OLAW, however, did not receive the preliminary report of the suspension until April 29, 2024, more than 10 months later.[28]

Similar concerns emerged at Newcastle University following an OLAW virtual site visit in 2025. Despite already conducting NIH-funded experiments on nonhuman primates,[29] the institution was directed to reevaluate tuberculosis testing practices, PPE standards to ensure they were "consistent and appropriate," and Herpes B virus testing procedures following potential human exposures. The

[22]National Institutes of Health. Assured Institutions Look Up Tool. Accessed October 12, 2026.
[23]CIDEIM. Single Tax Registry (RUT) Form. Accessed November 14, 2026. Colombian Tax Identification Number (NIT): 800.092.879.
[24]Icesi University. Form 5245: Application for the Special Tax Regime. Accessed November 14, 2026. Colombian Tax Identification Number (NIT): 890.316.745.
[25]Icesi University. 2024 and 2025 Annual Reports submitted to OLAW. March 21, 2025.
[26]RePORTER. Shining a light on bat cellular immunity following virus infection. Accessed October 12, 2026.
[27]CSIRO. Noncompliance report to OLAW. May 1, 2024.
[28]*Ibid*.
[29]RePORTER. Locating the neural substrates for the flexor synergy after stroke. Accessed November 14, 2026.

review also uncovered failures in the timely submission of required Federal Financial Reports and prompted revisions to collaboration agreements to clarify compliance and reporting responsibilities.[30]

The CSIRO and Newcastle cases demonstrate that significant facility, biosafety, and compliance deficiencies can remain undiscovered until after NIH funding has been awarded and experiments on animals are underway.

Announced and institution-controlled virtual visits provide little meaningful oversight

OLAW cites virtual site visits as evidence of its "enhanced oversight" of foreign institutions, but its own records show that these visits are announced far in advance and extensively coordinated with the institutions being reviewed. Simon Fraser University was notified on August 28, 2024,[31] and ultimately visited on November 20.[32] Ross University School of Veterinary Medicine was notified on November 25, 2024,[33] and visited on April 17, 2025.[34] Newcastle University was notified on May 15, 2025,[35] but its virtual visit did not occur until December 15–16.[36] OLAW's notification letters also contemplated pre-visit planning meetings and advance submission or availability of institutional records. Thus, the institutions knew for months that OLAW would be examining their animal-care programs and had substantial opportunity to review records, procedures, facilities, and readily visible deficiencies before OLAW saw them.

The visits also followed a predictable, largely institution-directed script. The proposed format began with introductions and a 1.5- to two-hour briefing and question-and-answer session attended by institutional officials and animal-care representatives, followed by a virtual tour of "key areas" and a 30-minute exit briefing. The virtual format prevents OLAW from independently choosing where to go, what to inspect, which records to examine in real time, or which personnel to interview privately. Instead, it sees the locations placed on camera, hears from the representatives assembled by the institution, and reviews documents the institution has prepared in advance. Although the records do not establish that any institution concealed problems or made cosmetic changes, the process gives institutions ample opportunity to curate what OLAW sees and to correct conspicuous deficiencies before the visit.

The post-visit correspondence further illustrates the limitations of this approach. At Simon Fraser, OLAW primarily praised the institution's program and presented its observations merely as items "for consideration."[37] At Ross, OLAW identified sanitation procedures that were still being updated and a centralized temperature- and humidity-monitoring system that had not yet been implemented, but subsequently relied on the institution's written account that revised procedures had been created and equipment was being installed.[38] OLAW's final letter to Ross thanked the institution and closed with commendations for its efforts.[39] At Newcastle, OLAW identified

[30]OLAW. Post-site visit letter to Newcastle University. December 29, 2025.
[31]OLAW. Visit notification letter to Simon Fraser University. August 28, 2024.
[32]OLAW. Post-site visit letter to Simon Fraser University. November 21, 2024.
[33]OLAW. Visit notification letter to Ross University School of Veterinary Medicine. November 25, 2024.
[34]OLAW. Post-site visit letter to Ross University School of Veterinary Medicine. April 22, 2025.
[35]OLAW. Visit notification letter to Newcastle University. May 15, 2025.
[36]OLAW. Post-site visit letter to Newcastle University. December 29, 2025.
[37]OLAW. Post-site visit letter to Simon Fraser University. November 21, 2024.
[38]Ross University School of Veterinary Medicine. Post-site visit letter to OLAW. October 9, 2025.
[39]OLAW. Post-site visit letter to Ross University School of Veterinary Medicine. December 22, 2025.

failures involving timely federal financial reporting, ambiguity over institutional responsibility in collaborative animal research, and biosafety practices that required reevaluation.[40] The university responded that it had resolved the reporting problems, amended its collaboration agreements, and was reviewing the suggestions regarding biosecurity protocols.[41] OLAW commended its efforts and concluded the exchange.[42]

These records undermine NIH's claim that virtual visits constitute meaningful "enhanced oversight." The visits function primarily as scheduled compliance reviews based on institutional presentations, selected camera tours, and self-reported corrective actions, rather than independent inspections capable of revealing ordinary, unprepared conditions. They may document that an oversight activity occurred, but they provide little assurance that OLAW observed conditions as they normally existed, independently verified corrective actions, or identified problems the institution had not disclosed.

Lack of transparency regarding NIH's enhanced oversight procedures

In its June 2026 response to PETA, OLAW cited enhanced oversight measures for foreign institutions, including virtual site visits, review of animal-welfare documentation, increased communication with institutions, and monitoring of noncompliance.[43] When PETA later sought records showing how these measures were implemented in practice, NIH required it to identify specific institutions. PETA subsequently submitted a list of 40 foreign organizations and requested records related to NIH's oversight activities, including annual reports, noncompliance reports, transcripts of virtual site visits, reviews of Research Performance Progress Reports, and the policies or procedures governing these processes. NIH ultimately produced 124 files but did not provide the requested SOPs, guidance documents, or visit transcripts. As a result, PETA was unable to determine whether standardized procedures exist, what questions were asked during the visits, how institutions were evaluated, or how OLAW verified the information it received.

The records that were produced also suggest that OLAW relies heavily on information provided by the institutions themselves. After excluding reports indicating that no covered animal experiments were conducted, reports involving only NSF-funded activities, and duplicate records, PETA identified 70 annual reports concerning NIH-supported animal activity during the 2023–2025 reporting periods. Of those, 67 disclosed no reportable noncompliance. This unusually low rate of self-reported problems does not demonstrate near-perfect compliance among foreign institutions. Rather, it highlights the extent to which OLAW depends on institutions to identify, characterize, and report their own violations.

The University of Sydney/Centenary Institute case illustrates the limitations of this approach. A significant compliance problem involving NIH-funded experiments on animals conducted outside the institution covered by the applicable Assurance remained undetected until review of an animal death incident prompted additional scrutiny. Problems that institutions fail to recognize, misunderstand, or do not report simply remain invisible to OLAW.

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[40]OLAW. Post-site visit letter to Newcastle University. December 29, 2025.
[41]Newcastle University. Post-site visit letter to OLAW. January 30, 2026.
[42]OLAW. Post-site visit letter to Newcastle University. February 10, 2026.
[43]NIH Office of Laboratory Animal Welfare. Response to PETA, June 5, 2026.

Apparent protocol deviations and oversight failures in Argentina

Additional concerns about NIH's oversight emerged from the NIH-funded project "Targeting purinergic signaling in Chagas disease," awarded to the Research Center in Clinical Biochemistry and Immunology (CIBICI-CONICET), in Argentina. The grant has been active since April 2023 and is scheduled to end in March 2028.[44] An August 2026 preprint authored by the NIH-grant principal investigator describes infected mice developing continuous whole-body tremors, bristled fur, and partial loss of hind-limb mobility, typically around 14–15 days after infection. The preprint also reports the unexplained loss of an animal in the uninfected control group and states that none of the untreated infected mice survived the experiment's 120-day endpoint.[45]

The approved animal-use protocol explicitly requires euthanasia when mice exhibit reduced mobility.[46] Yet the preprint describes this very condition appearing around days 14–15 after infection, raising serious questions about whether the experimenters adhered to their own humane endpoints and how they anticipated managing the animals' suffering over a study extending to 120 days.

In response to PETA's request for animal medical histories, veterinary and monitoring records, necropsy reports, and photographic or video files, the principal investigator stated that the laboratory does not generate animal records and provided none of the requested documentation, despite asserting that specially trained personnel monitor the animals daily.[47] Consequently, PETA received no documentation establishing whether affected mice were euthanized upon reaching the approved humane endpoints or were allowed to deteriorate further. The response also left unanswered how the laboratory documented the deaths and unexplained animal loss described in the preprint.

The preprint also describes administering treatments via oral gavage, although the approved protocol specifies administration by pipette and expressly states that the drug-delivery systems are unsuitable for gavage.[48] This apparent deviation is particularly concerning because oral gavage involves inserting a tube into the animal's stomach and carries greater risks of stress and injury than less invasive oral administration methods.

The principal investigator further acknowledged that the animal-use approval cited in the preprint was incorrect, identifying instead a resolution issued in February 2026,[49] three years after the NIH grant began. The documentation provided did not clarify when the experiments began or under what authorization they were conducted before that approval, if any.

PETA subsequently requested all noncompliance reports and other oversight records for the PHS-assured institution covering January 2020 through October 2026. NIH produced no noncompliance

[44]RePORTER. Targeting purinergic signaling in Chagas disease. Accessed October 6, 2026.
[45]Rosso SD, Bergero G, Luciana Mazzocco Y, Mezzano L, García MC, Aoki MP. Multiparticulate drug delivery systems preserve the efficacy of reduced-dose intermittent benznidazole therapy in experimental Chagas Disease. Preprint. *Res Sq*. 2026;rs.3.rs-10424380. Published 2026 Aug 28. doi:10.21203/rs.3.rs-10424380/v1. Accessed October 1, 2026. [PDF available here]
[46]Aoki MP. Optimización de la eficacia y seguridad de nuevos sistemas de liberación modificada de fármacos para la terapia de la enfermedad de Chagas experimental. February 3, 2026.
[47]Aoki MP. Correspondence with the University Nacional de Córdoba's legal team. October 6, 2026.
[48]Aoki MP. Optimización de la eficacia y seguridad de nuevos sistemas de liberación modificada de fármacos para la terapia de la enfermedad de Chagas experimental. February 3, 2026
[49]Universidad Nacional de Córdoba. Resolución Decanal RD-2026-146-E-UNC-DEC#FCQ. February 23, 2026.

reports addressing the apparent discrepancies or unexplained animal loss that PETA independently uncovered by examining the experimenters' own documents. This raises serious questions about the effectiveness of NIH's enhanced oversight: If foreign institutions fail to identify or report potential violations, what mechanisms does NIH have to detect them independently?

It is time to stop funding experiments on animals at foreign organizations

NIH's inability to meaningfully oversee animal experiments conducted at foreign organizations should itself be sufficient reason to end this use of taxpayer dollars. The records described above reveal a system that failed to prevent or promptly identify significant compliance, oversight, and accountability problems despite NIH's purportedly enhanced oversight measures. However, even if NIH could establish rigorous oversight of every foreign facility it funds, a more fundamental question would remain: Why should limited federal resources support animal experiments that have little to no relevance to human biology and may never lead to treatments or cures?[50]

An Animal Welfare Assurance addresses regulatory compliance; it does not make an animal model relevant to human disease or demonstrate that an experiment will benefit patients. NIH should instead prioritize human-relevant research that can more directly advance the understanding, prevention, and treatment of disease. Where international collaboration offers compelling scientific value, NIH should support human-biology-based studies and clearly defined partnerships between U.S. and foreign organizations, with transparency and appropriate accountability for federal funds. The objective should not be to build increasingly complex systems for monitoring animal experiments abroad, but to invest in research with the greatest potential to improve human health.

Thank you for your time and careful consideration of these concerns. I look forward to your response.

Sincerely,

Magnolia

Magnolia Martínez, Ph.D.
Lead Projects Manager and Congressional Liaison
Laboratory Investigations Department

Copy: Office of Laboratory Animal Welfare (OLAW), National Institutes of Health ([redacted])

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[50]For more information on this topic and a roadmap for innovation in biomedical research, please visit PETA's Research Modernization NOW.