AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

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November 5, 2026

Axel Wolff, DVM
Director
Office of Laboratory Animal Welfare
National Institutes of Health

Dear Dr. Wolff:

On behalf of People for the Ethical Treatment of Animals (PETA), I am writing to request that the National Institutes of Health's Office of Laboratory Animal Welfare (OLAW) investigate apparent violations of the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) at Johns Hopkins University (JHU; Animal Welfare Assurance ID D16-00173, A3272-01). The enclosed U.S. Department of Agriculture (USDA) report, documenting a September 10, 2026, inspection, identifies three critical repeat violations involving failures to follow approved protocols, ensure personnel competence, and provide adequate veterinary attention. These failures involved animals whose deteriorating conditions went unreported to veterinarians, monkeys who sustained traumatic brain injuries, and bats who died after exposure to extreme heat.

It appears that JHU has not self-reported these incidents to OLAW. We request that your office determine whether the university fulfilled its reporting obligations and investigate both the underlying incidents and any failure to report them promptly. Given JHU's longstanding pattern of failing to comply with minimal animal welfare standards, we urge OLAW to exercise its enforcement authority, including revoking JHU's Animal Welfare Assurance.

Failure to follow monitoring and humane endpoint requirements
USDA cited JHU for a critical, repeat violation of 9 C.F.R. § 2.31(c)(7) after laboratory personnel failed to follow approved requirements for monitoring animals and notifying veterinarians.

Under Protocol RB-1, a rabbit "lost a significant amount of body weight and had a poor body condition score" after receiving an immunosuppressive drug. Although the protocol required veterinary consultation after a specified degree of weight loss and established an endpoint at which the rabbit should be euthanized, laboratory staff either failed to recognize the rabbit's deteriorating condition or failed to take the prescribed action. Their failure to alert veterinarians allowed the rabbit's condition to reach or exceed the euthanasia criteria without the required veterinary intervention. Veterinary personnel discovered the rabbit's condition only during a scheduled surgery, at which point the rabbit was euthanized.

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In another incident, two rhesus macaques used in Protocol PRBB-1 deteriorated to the point of requiring euthanasia after laboratory staff failed to follow required monitoring procedures, initiate prescribed treatment, or notify veterinarians of their poor health. Veterinarians discovered the monkeys' significant weight loss and poor body condition during a routine assessment, by which time both had reached or exceeded the study's euthanasia endpoints.

These incidents do not comply with Sections IV.C.1.a, c, and e of PHS Policy, which require that experiments on animals "will avoid or minimize discomfort, distress, and pain to the animals, consistent with sound research design"; that animals who "would otherwise experience severe or chronic pain or distress that cannot be relieved will be painlessly killed at the end of the procedure or, if appropriate, during the procedure"; and that "medical care for animals will be available and provided as necessary by a qualified veterinarian." We ask OLAW to determine how long the animals remained at or beyond intervention thresholds, why personnel failed to recognize, document, or report the animals' deteriorating conditions, and why approved safeguards failed to prevent these outcomes

Traumatic brain injuries associated with headcap maintenance

USDA also cited JHU for a critical, repeat violation of 9 C.F.R. § 2.32(a). Two rhesus macaques with headcaps—devices surgically affixed to their skulls—developed neurological deficits so severe that, following veterinary evaluation, both were euthanized based on their clinical signs and the study's endpoint criteria.

Necropsies revealed traumatic damage to their brains. The IACUC's investigation concluded that the trauma most likely resulted from procedures performed by the principal investigator and a research assistant while cleaning the headcaps and removing granulation tissue around the implants—procedures that apparently inflicted traumatic brain injuries that led to the monkeys' severe neurological deficits and euthanasia.

These findings raise serious concerns under PHS Policy sections IV.C.1.a. and f., which require minimization of pain and distress and that "personnel conducting procedures [on animals] be appropriately qualified and trained in those procedures." The USDA inspection report identifies protocol suspension, replacement of core research staff, enhanced veterinary oversight, and training as corrective measures. We ask OLAW to obtain the investigation report, necropsy findings, personnel training records, and protocol-suspension documentation to determine how personnel were permitted to perform procedures that apparently caused traumatic brain injuries.

Five bats died after failures to follow veterinary instructions and communicate health concerns

USDA's third critical, repeat citation, under 9 C.F.R. § 2.33(b)(3), concerns a colony of 39 big brown bats housed in a rooftop enclosure.

On July 1, a veterinarian recommended temporarily moving the colony indoors. The subsequent agreement allowed the bats to remain outside with additional water and fans but required that the entire colony be moved indoors if any bat appeared distressed. During July 4 and 5, ambient temperatures ranged from 90 to more than 100 degrees Fahrenheit. A bat found dead on July 4 was

not reported to veterinarians. Additional bats were found dead or severely dehydrated on July 5, yet the colony was not moved indoors until that evening. By the morning of July 6, five bats had died.

These failures do not comply with PHS Policy sections IV.C.1.d. and e., which require that animals be provided with living conditions that "contribute to their health and comfort" and the imperative that "medical care for animals … be available and provided as necessary by a qualified veterinarian." We ask that OLAW investigate the delayed notification after the first bat's death, failure to implement the relocation instructions promptly after additional bats were found dead or severely dehydrated, and the adequacy of safeguards against further heat-related injuries and deaths.

Apparent failure to report serious noncompliance
PHS Policy section IV.F.3 requires prompt reporting of serious or continuing noncompliance, serious deviations from *the Guide for the Care and Use of Laboratory Animals*, and IACUC suspensions. OLAW's reporting guidance identifies protocol violations, failures to carry out veterinary orders, and conditions causing animal harm or death as reportable circumstances. USDA's discovery of an incident does not remove an institution's reporting obligation.

We ask that OLAW determine Assurance coverage for each incident described above and whether JHU reported the incident promptly, completely, and in accordance with PHS Policy.

Repeated failures demand stronger enforcement
These findings reflect JHU's longstanding failure to meet minimal animal welfare standards. Since August 2021, USDA has cited the university no fewer than 21 times, including 11 citations for "critical" violations—a designation that includes noncompliance having a serious or severe adverse effect on an animal's health and well-being. Earlier citations involved failures to provide pain relief, use of expired drugs, unreported broken bones, and failures to maintain sterile conditions.

The designation of all three September 2026 citations as repeat violations underscores the inadequacy of previous efforts to secure lasting compliance. Although the report records corrective measures for some findings, retraining and assurances of improved oversight do not erase the animals' suffering or demonstrate that recurring institutional failures have been resolved.

In fiscal year 2026, JHU received more than $840 million in NIH grants. These funds come with the expectation and obligation that the university will comply with minimal animal-welfare standards that reflect the American public's expectations. Repeated failures to meet those standards demand meaningful consequences.

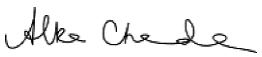
OLAW's mandate includes evaluating noncompliance and restricting or withdrawing approval of Animal Welfare Assurances. We urge OLAW to fulfill that mandate by conducting a thorough investigation and taking strong measures to bring JHU into compliance, including revoking its Animal Welfare Assurance, as permitted under Sections IV.A. and V.A.1 of PHS Policy. Any subsequent approval should depend on independently verified, sustained correction of the underlying deficiencies.

We request that OLAW obtain the relevant protocols, veterinary and husbandry records, IACUC investigations and meeting minutes, corrective-action and training records, and reporting

correspondence; assess whether earlier corrective measures failed; and coordinate with the relevant NIH funding components regarding any affected awards. Please acknowledge receipt and provide PETA with the findings and enforcement actions resulting from your investigation.

Thank you for your attention to this urgent matter.

Sincerely,



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Enclosure: USDA inspection report for Johns Hopkins University, inspection dated September 10, 2026; report prepared October 6, 2026