Animal Defenders International
6100 Wilshire Blvd., Suite 1150, LOS ANGELES, CA 90048. Tel: +1 323 935 2234 Fax: +1 323 935 9234
www.adiusa.org usa@ad-international.org

March 18, 2015

Tom Vilsack
Secretary of Agriculture
Agricultural Research Service Panel, USDA
ahwrpanel@usda.gov

RE: ADI's response to call for public comments in response to UMARC Panel Report

Dear Secretary Vilsack and the Agricultural Research Service Panel,

Animal Defenders International (ADI) offers the following in response to the Secretary's request for public comments in response to the Panel's investigative report following the recent NY Times piece criticizing methods at UMARC as cruel, redundant, and blind to the needs of the animals and opinions and desires of its presumed target – American ranchers.

Primarily, the Panel Report notes no evidence of abuse and finds criticism largely in oversight and recording procedures after its 2-day inspection admittedly performed in close coordination with and in view of the Center's administration. In stark contrast to the Panel's 2-day guided overview of UMARC operations, the NY Times article claims a year-long investigation interviewing 2 dozen current and former employees, garnering particular, identified charges quoted from eyewitness internal sources, and reviewing thousands of pages of internal documents. Notably, the Panel's Report utterly fails to address and attempts no response to the following specific charges of particular events at the Center laid out according to the NY Times investigation:

- **Surgery performed by non-medical personnel;**
- **Continued cattle Twin Breeding efforts (the Twinning Project) despite high death rates and zero rancher interest** since 1984.
    - 'The experiment had many earmarks of the center's most troubling work: an audacious concept, a laser like focus on one aspect of the animal and a determination to press on despite the mounting toll.'
    - '**unsettling side effects** surfaced. Some 95 percent of the females born with male siblings had deformed vaginas. Many of the twins died during birth … Even calves born singly had trouble getting out: The mothers had been bred with such large wombs, to accommodate twins, that the calf could not get enough traction. … breeding increasingly yielded triplets, with 12 legs to get tangled. By 2001, the center was reporting that **16.5 percent of twins and triplets were dying, a rate more than four times that of single calves**.'
    - '**Ranchers, however, were skeptical**. … Many ranchers were unswayed. The center's efforts to shore up the cows' health only convinced them that breeding twins was too much work and too expensive.'
    - A 2009 report by a New Zealand cattle expert, Duncan Smeaton, who had visited the project and spoken to **ranchers. "The consensus view is that they do not want twins**."
- **Continued "Easy care" sheep experiment despite ten years evidencing high death rates specific**

sharp criticism by academic peers and industry targets

- ‘Cristiano Bouéres, a visiting student from Brazil, was assigned in 2012 to gather the dead lambs as part of his veterinary program at the university, and told to ignore the rest’ leaving him ‘dismayed and bewildered by the gulf between the experiment and his training.’
- These lambs were already considered a ‘higher risk’ as the result of breeding experiments aimed at larger litters
- ‘In a 2011 memo, the experiment’s lead scientist, Kreg A. Leymaster, beseeched the center’s director for help after 12 lambs were killed [by coyotes] in four days. The center added more guard dogs, but in just the first half of 2014, records show, 21 lambs were killed.’
- **Death rates** at 1/2 to 1/3 the lambs, ‘**far beyond the 10 percent that many industry experts say is considered acceptable in sheep farming**.’
- ‘**the concept of withholding care is bound to be unthinkable to most sheep growers**, said David R. Notter, a professor emeritus of animal and poultry sciences at Virginia Tech who consults for ranchers. “You can’t just turn and go, saying to yourself, ‘I think that lamb is going to be dead in three days’ ”
- Michael L. Thonney, a Cornell professor of animal science, said the university panel that oversees his work would not have let him ignore vulnerable lambs. “**There is no reason to allow animals to have that kind of suffering**”

- No accounting of sheep injuries or treatment
- **Experiments seeking larger lambs resulted in deformed ewes and high death rates**, and were ultimately abandoned “because it had **little to offer sheep producers**.”
- Research to increase pig litters despite noted industry issues of weaker piglets and larger litters connection to greater numbers of piglets being crushed by their mothers
- **Lean pigs so low in fat that 1 in 5 cannot reproduce**.
- **Trials continuing long after meat producers “balked at the harm they caused animals”**
- **6,500 deaths by starvation since 1985**
- **625 deaths by mastitis, though this is typically treatable**
- “They pay tons of attention to increasing animal production, and just a pebble-sized concern to animal welfare,” said James Keen, a scientist and veterinarian who worked at the center for 24 years. **“… most Americans and even livestock producers would be hard pressed to support some of the things that the center has done**.”
  - Dr. Keen … veterinarian … **questioned the logic of expecting domestic animals to perform like wild ones. “Because we’ve already bred all of the wild out of them** … And they’ve been trying for 10 years.”
  - Dr. Keen recalling an incident in 1989: “There was **a young cow, a teenager, with as many as six bulls**,” he recalled. “The bulls were being studied for their sexual libido, and normally you would do that by putting a single bull in with a cow for 15 minutes. But **these bulls had been in there for hours mounting her. … The cow’s head was locked in a cagelike device to keep her immobile … Her back legs were broken. Her body was just torn up**.” According to the article, ‘Dr. Keen wanted to euthanize the animal, but the scientist in charge could not be tracked down for permission. A few hours later, the cow died. The episode was unusual in its violence, and current center officials said they were not aware of it.’
  - Dr. Keen and co-workers recounted other instances they said attested to the same problem: a **recurring failure to fully consider the pain that animals suffer during experiments, or in everyday life at the center**.
  - Dr. Keen said he and his students were startled last March to come across an **emaciated ewe, in plain view of center employees, unable to eat because of a jaw abscess that had likely been growing for months.** The ewe eventually died, records show, becoming the **245th animal to succumb to an abscess since 1985**.
- “It should have been the best research center in the world, and it’s not,” said Gary P. Rupp, a

longtime director of the veterinarian teaching program who retired in 2010 … "**The death loss was higher than it should have been."**

- '**The scientists, who do not have medical degrees, and their assistants euthanize and operate on livestock, sometimes doing two or more major surgical operations on the same animal.**
    - Robert A. Downey, executive director of the Capital Humane Society, in Lincoln, Neb., alerted by the staff, complained to the center director. "**Experimental surgery is being performed in some (not all) cases by untrained, unskilled and unsupervised staff. …This has resulted in the suffering of animals and in some cases the subsequent death of animals**." During a visit, he said, he saw animals headed to surgery that fell from carts or were pushed to the floor by their handlers, while two other workers in the operating room ate doughnuts. The director responded that the center was reviewing its surgical procedures and recommending improvements in animal care.
    - John Klindt, a scientist who retired in 2008: "**A vet has no business coming in and telling you how to do it," he said. "Surgery is an art you get through practice**."
- Veterinarian, Shuna A. Jones, wrote to scientists and managers in 2011 and 2012 with a variety of concerns, including **barns so stuffed with pigs that workers could not clean them, resulting in spates of diarrhea and respiratory disease**. "This is a scheduling nightmare," wrote Dr. Jones . "We have pigs everywhere."
- Dr. Rupp, the former teaching program director, said he had **fought to get cows more nutrients and shelters. Thirty to 40 have died on average each year of exposure to bad weather**, records show — not including storms in which hundreds have perished, center scientists say.
- Roger Ellis, a scientist and veterinarian who now works for a cattle nutrition company, said that **when he determined about 10 years ago that a sheep had died at least in part from neglect, a center official pressed him to "soften the diagnosis." Dr. Ellis said that he refused, and that the center had an outside veterinarian change the death record.**
- An animal manager, Devin M. Gandy, complained in 2012 that swine were kept **in pens so small, 4 feet by 4 feet, that they appeared to violate basic rules on animal care.** He got an email reply from the experiment's lead scientist saying the pigs had enough room, adding, "A lot of time has been wasted addressing a nonissue."
- Geoffrey Hirsch, a former technician discussing failed efforts to euthanize a pig: '**it was still thrashing and gagging. Worse, Mr. Hirsch said, the scientist who had erred "seemed to be getting some kind of enjoyment out of this thing, talking and shouting at the animal, " 'How do you like that, pig?**' …. The whole process was **shocking**." The scientist leading the trial stormed back to his office to write a complaint about the animal's treatment, after informing his boss, William Laegreid. "There were ill feelings towards him and me and the unit after that," recalled Dr. Laegreid, who now directs the veterinary science program at the University of Wyoming. "There is always this issue," he said. " 'You damn veterinarians think you know better.'
- A Times examination of 850 experimental protocols since 1985 showed that the **approvals** were typically made by six or fewer staff members, **often including the lead researchers for the experiment.**
- The university's director of research compliance, Christopher S. King, and a prominent animal researcher, Joseph Thulin, reviewed several of the center's protocols for this article and **found them lacking in critical details**, like how to perform life-threatening procedures, and guidelines for when to stop a trial if animals were suddenly in jeopardy. "**These would not pass muster at many institutions**," said Dr. Thulin, a veterinarian who directs the Biomedical Resource Center at the Medical College of Wisconsin.
- Last year, the center set out to show that its cows could thrive on a growth stimulant called Zilmax. Months earlier, the drug had been withdrawn by its manufacturer, Merck & Company, amid concern in the meat industry that it caused rare complications, like hooves that slough off, and was associated with higher death rates.

- Last February, Katherine Whitman, a University of Nebraska veterinarian proposed an experiment to find more effective pain medicine for two common procedures on sheep: tail removal and castration. Her proposal was turned down by Mr. Leymaster, the center's sheep expert. One reason for the denial: **The center said it lacked the expertise to assess the pain felt by animals.**

The Panel's response does not justify continued taxpayer funding of decades long experiments which cause extreme suffering, have shown little promise, and limited interest from the target industry – case in point, the continued cattle Twin Breeding project. As a result, the Panel Report is wholly inadequate. It fails to address most of serious concerns raised by the NY Times article, which as we understand it, instigated the Secretary's call for the Panel investigation in the first instance.

ADI calls on the Secretary, the Panel, and UMARC to respond specifically to these charges and to the serious concerns of peers, colleagues (including veterinarians), and UMARC's presumed target – American ranchers and consumers - with necessary modifications which aim to become, as per its stated mission, a "premier scientific organization."

Sincerely,

Christina Scaringe
christinascaringe@ad-international.org
General Counsel
Animal Defenders International
6100 Wilshire Boulevard, #1150
Los Angeles, CA 90048
Tel: (323) 935-2234
Mobile: (850) 728-0598
www.ad-international.org