



Animal Welfare Institute

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The Animal Welfare Institute submits these comments in response to the report [“Findings and Recommendations on the Animal Care and Well-Being at the U.S. Meat Animal Research Center to the Secretary of Agriculture and the REE Under Secretary,”](#) submitted by the U.S. Department of Agriculture’s (USDA) Animal Handling and Welfare Review Panel, which was established in response to the [New York Times’](#) (NYT) shocking exposé of animal cruelty at the Agricultural Research Service’s Meat Animal Research Center (MARC) in Nebraska.

AWI is sorely disappointed in the tone and content of the panel’s report on MARC. Most glaring is the fact that it doesn’t merely fail to address the cruelty allegations; it also does not even acknowledge them. Shortcomings in the systems they reviewed would certainly have a negative impact on animal welfare and, at the very least for that reason, that relationship should have been examined. The fact that the Office of Inspector General is reviewing the reports of cruelty did not relieve the panel of its obligation to factor them into its own review.

Instead, the panel’s visit focused on current processes rather than on the incidents of cruelty and the culture that allowed these practices to continue for decades. In spite of this shortcoming, the panel did find many serious failures in oversight and protocol. It found, for example, that MARC:

(1) “did not comply fully with the intent or guidance within the Guide for the Care and Use of Agricultural Animals in Research and Teaching” (Ag Guide);

(2) has no written agreement with the University of Nebraska at Lincoln or other partners regarding lines of responsibility for animal care. The panel noted the “potential for confusion about lines of authority and oversight responsibility. Procedures for animal care and use are also not adequately documented.” Perhaps this helps to account for the NYT’s finding that “[e]ven routine care has fallen short. Of the 580,000 animals the center has housed since 1985,...at least 6,500 have starved. A single, treatable malady—mastitis, a painful infection of the udder, has killed more than 625.” In 2014, “...an emaciated ewe, in plain view of center employees, [was] unable to eat because of a jaw abscess that had likely been growing for months. The ewe eventually died, the records show, becoming the 245th animal to succumb to an abscess since 1985.” One person familiar with the program was quoted as saying, “The death loss was higher than it should have been.”

(3) has no “clearly defined animal handling training program.” Even in the absence of such a training program, however, the panel found that the “training of animal care staff appeared adequate and appropriate.” This statement strains credibility. The Ag Guide states that one objective of such a training program is to provide information about “methods for minimizing the number of animals used and techniques for minimizing pain and distress...” However, according to the NYT, MARC staff attested to “a recurring failure to fully consider the pain that animals suffer during experiments, or in everyday life at the center. Some employees blamed inadequate training or budgets; others pointed to friction between scientists bent on their research and veterinarians, who take an oath to protect animals.”

This illustrates another deficiency the panel found:

(4) the Institutional Animal Care and Use Committee (IACUC) failed to fulfill its role and responsibilities. The panel described an “informal process” for reviewing and approving research projects, which resulted in an “Experimental Outline” being produced and “circulated for review and final approval...” It found “no evidence of formal review or approval of the proposed research by IACUC members.” IACUCs have many important functions in the approval and conduct of research, and the panel found that MARC’s IACUC was particularly deficient “in regards to its duty to ‘review and approve or disapprove protocols and other proposed activities, or proposed significant changes in activities, related to agricultural animal care and use in research and teaching.’” These findings demonstrate that the oversight and transparency necessary for ensuring animal welfare is simply nonexistent at MARC and are likely responsible, along with the other noted failures, for the egregious experiments being conducted on animals at MARC. And, perhaps, for the rejection of possibly beneficial research. Just last year, a veterinarian at the center proposed a modest experiment to “find more effective pain medicine for two common procedures on sheep: tail removal and castration.” Her goals were twofold: Benefit the animals, and enable meat producers to show they care about the animals’ pain, which consumers are starting to demand. The center’s sheep expert rejected the proposal. In an email, he told her that “the center’s sheep research...had only two objectives: fighting pneumonia, and enhancing ‘the competitiveness, profitability and sustainability of lamb production with reduced labor inputs.’” In other words, the much-maligned “easy care sheep” experiment.

Despite these and other serious shortcomings, all of which would have affected animal welfare and could have been partly responsible for the gruesome research projects reported by the NYT, the panel found ‘no deficiencies’ in animal care. That conclusion, too, strains credibility. But given the ample amount of time MARC staff had to prepare for this scheduled visit, the findings are not a surprise.

We find some relief in the panel’s recommendation that USDA should not initiate new experiments at MARC until the IACUC is compliant with ARS policies and procedures, but are dismayed that the panel only reviewed research processes, not research practice. The abuse of animals must be investigated, preferably by a truly independent panel comprised of people knowledgeable about farm animal care and welfare. Secretary Vilsack already has the authority to enact changes to improve research oversight and animal welfare. He should exercise that authority.

The public reaction to the NYT’s revelations was shock and anger. Even agricultural industry publications have questioned the merits of the bizarre and gruesome experiments that went on at MARC. Members of Congress have expressed their concerns to Agriculture Secretary Tom Vilsack in a number of ways, including the introduction of bipartisan legislation to address MARC’s problems. Yet, there is no sense of urgency in the report.

We hope that Secretary Vilsack will nonetheless address this untenable situation with the urgency that it warrants. Many steps must be taken to ensure that the activities at MARC are carried out humanely. In fact, it must be emphasized that requiring federal facilities such as MARC to adhere to certain minimum standards of humane care would benefit research by ensuring that protocols are carefully thought out and followed. Better care of animals reduces extraneous variables and, in so doing, yields more reliable results. Besides implementing the panel’s recommendations, the Secretary is urged to take the following additional steps:

- The Secretary should order that MARC and all similar facilities abide by the Animal Welfare Act (AWA) in all their research.
- They should also be required to submit annual reports in the same manner as other research facilities do under the AWA.
- The Secretary should direct the Animal and Plant Health Inspection Service to conduct annual unannounced inspections of MARC and similar facilities as are conducted at research facilities covered by the AWA.
- In addition to a moratorium on NEW animal research projects, USDA should also suspend all ongoing research projects, until there is a fully functioning IACUC.

In light of this report, there is, unfortunately, little reason to be optimistic about Phase II of USDA's report in response to the MARC scandal since the panel will simply be applying the same "methodology" to review research processes at 3-5 additional Agricultural Research Service (ARS) locations.

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