



Stop Animal Exploitation NOW!

Dr. Robert Gibbens
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Fort Collins, CO 80526-8117

2/5/14

Dr. Gibbens,

I am writing to you today to file an Official Complaint against the University of Washington (91-R-0001), for what I believe are clear violations of the Animal Welfare Act which occurred in the last two years.

The incidents that I am referencing were reported by the University of Washington to the National Institutes of Health as being non-compliances with PHS policy on animal care/use. Most of these incidents are also clearly violations of the Animal Welfare Act, upon which the NIH policies are based.

On July 30, 2013, the University of Washington reported an incident in which the pelvis of a rabbit was fractured. The fracture was discovered following one day's participation in the acclimation portion of a study involving chewing. Clearly this rabbit was handled improperly, causing the pelvis fracture. I believe this would constitute a violation of section 2.38 Miscellaneous: (f)(1) Animal Handling and it may also indicate a violation of "Sec. 2.32 Personnel qualifications.(a) It shall be the responsibility of the research facility to ensure that all scientists, research technicians, animal technicians, and other personnel involved in animal care, treatment, and use are qualified to perform their duties. This responsibility shall be fulfilled in part through the provision of training and instruction to those personnel. (b) Training and instruction shall be made available, and the qualifications of personnel reviewed, with sufficient frequency to fulfill the research facility's responsibilities under this section and Sec. 2.31.(c) Training and instruction of personnel must include guidance in at least the following areas: (1) Humane methods of animal maintenance and experimentation, including: (i) The basic needs of each species of animal; (ii) Proper handling and care for the various species of animals used by the facility." Clearly, animal care and research staff should be trained properly so that injuries as severe as a broken pelvis could be avoided.

On November 29, 2012, the University of Washington reported that post-surgical pain relief had been denied to 30 rabbits for a period of 10 months, in contradiction to an approved experimental protocol. This is a clear and ongoing violation of section 2.31 Institutional Animal Care and Use Committee, and it may also be a violation of section 2.33 Attending Veterinarian and Adequate Veterinary Care: "(4) Guidance to principal investigators and other personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia;"

I hereby file an Official Complaint against the University of Washington for failure to handle animals properly, adequately train personnel, provide adequate veterinary care, etc.. I must insist that your office institute an immediate investigation.

I know that your office considers major violations of the Animal Welfare Act to be very serious in nature, especially when these violations kill or seriously injure animals. Since the University of Washington has a long history of animal abuse which has led to multiple animal deaths, I must insist that you take the most severe action allowable under the Animal Welfare Act and immediately begin the process of issuing the maximum fine allowable against the University of Washington at the completion of your investigation -- \$10,000 per infraction.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,

Michael A. Budkie, A.H.T.,
Executive Director, SAEN

Attachments: 2 NIH Non-Compliance Reports